

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

WIPQTUS INC.,
Patent Owner

Case No. IPR2024-00023

Patent No. 10,038,339

**PATENT OWNER WIPQTUS'S CONTINGENT MOTION TO AMEND
UNDER 37 C.F.R. § 42.121**

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I. INTRODUCTION

Pursuant to 35 U.S.C. § 316(d) and 37 C.F.R. § 42., WiPQTUS, Inc. (“WiPQTUS” or “Patent Owner”) submits this motion to amend U.S. Patent No. 10,038,339 (“the ’339 Patent”) contingent on the outcome of this trial. In the event the Board find any of the claims 1, 2, 3, 5, 7, or 9 (“Challenged Claims”) to be unpatentable, WiPQTUS requests that the Board grant this motion to amend and substitute proposed claims 21-32 for original claims 1-12. WiPQTUS has conferred with the Board on 5/29/2024 as required by 37 C.F.R. § 42.121(a). WiPQTUS hereby requests the Board’s preliminary guidance.

The amendments to claims 21 and 23 reflect the claim construction advocated by WiPQTUS for certain terms of claims 1 and 3 in Patent Owner WiPQTUS Inc’s Response (“Patent Owner’s Response” or “Response”). Claims 22, 24-32 are only amended to reflect their new dependency from the substitute independent claim 21.

In addition, WiPQTUS requests determination that the amended claims and original patent claims are substantially identical within the meaning of 35 U.S.C. § 252. This request is made pursuant to PTAB Consolidated Trial Practice Guide, 70; *see also*, 84 Fed. Reg. 64,280 (Nov. 21, 2019).

As explained below, WiPQTUS satisfies the requirements for a motion to amend because the proposed substitute claims: (1) do not impermissibly enlarge claim scope; (2) Claims 21, 22, 23, 25, 27, 29 correspond to the Challenged Claims and therefore are a reasonable number of substitute claims, and Claims 24, 26, 28, 30 – 32 merely conform the un-challenged dependent claims to depend from the new independent claim 21; (3) do not introduce new subject matter; and (4) respond to a ground of unpatentability in the trial. Accordingly, should the Board find any of the Challenged Claims to be unpatentable, and contingent on the Board finding any of the Challenged Claims to be unpatentable, WiPQTUS respectfully requests that the '339 Patent be amended to include the corresponding substitute claims attached in Appendix A.

II. LEGAL STANDARD

A patent owner may propose a reasonable number of substitute claims for each challenged claim. 35 U.S.C. § 316(d)(1)(B). A patent owner must show that the substitute claims are non-broadening, supported by the application as filed, do not introduce new matter, and are responsive to the instituted grounds. 35 U.S.C. § 316(d)(3); 37 C.F.R. § 42.121(a)(2), (b); *see also Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, -01130, Paper 15 at 4 (PTAB Feb. 25, 2019). If a patent owner meets these requirements, the Board will consider whether the substitute

claims are unpatentable by a preponderance of the evidence. *L&P Property Mgt. Co. v. Remacro Machinery & Tech. Co., Ltd.*, 2019 WL 2521255, IPR2019-00255, Paper 15 at 6 (P.T.A.B. Jun. 18, 2019) (Paper No. 15). Petitioner has the burden to show the amended claims are unpatentable over the prior art. 37 C.F.R. § 42.121(d)(2); *see also Aqua Products Inc. v. Matal*, 872 F.3d 1290, 1324 (Fed. Cir. 2017) (*en banc*). In a motion to amend, a patent owner need only satisfy its burden of production under 35 U.S.C. § 316(d) and 37 C.F.R. § 42.121(d)(1).

A patent owner must disclose any information material to patentability of which the patent owner is aware to comply with the duty of candor. 37 C.F.R. § 42.11.

III. SUBSTITUTE CLAIMS DO NOT EXPAND THE SCOPE OF THE CLAIMS OF THE '339 PATENT

The proposed substitute claims do not enlarge the claim scope. 35 U.S.C. § 316(d)(3); 37 C.F.R. § 42.121(a)(2)(ii). As shown in Appendix A, proposed substitute independent claim 21 further limits its corresponding original independent claim 1 by adding the limitation “a collection of two or more electrical components from the list (i) one or more passive components, (ii) one or more active components, or (iii) one or more switches”. In addition, the added limitation “while configured to receive said power from the wireless power transmitter”

reflects Patent Owner's interpretation of limitation [1.e]. *See* Decision Granting Institution of *Inter Partes Review* ("Decision"), p. 23.

The proposed substitute claim 23 also further limits its corresponding original claim 3 by narrowing the claim element “one or more passive components” of the “impedance network” by requiring that “at least one” of the “passive components” “is (1) chosen a priori with a fixed value and (2) tuned during operation over a range of values.” *See* Appendix A. The term “fixed values” is modified to “a fixed value” to match the narrowed claim element. Also, the proposed substitute claim 23 is dependent on proposed substitute claim 21 and incorporates all the additional limitations. Therefore, both proposed substitute claims retain all the limitations of their corresponding original claims.

Proposed substitute dependent claims 22, 24-32 are only amended to reflect their new dependency from the substitute independent claim 21. Therefore, they incorporate all the limitations of proposed substitute independent claim 21 and do not enlarge the claim scope. The proposed substitute claims do not broaden the original claims.

IV. WIPQTUS PROPOSES A REASONABLE NUMBER OF SUBSTITUTE CLAIMS

A patent owner must "propose a reasonable number of substitute claims." 35 U.S.C. § 316(d)(1)(B) and 37 C.F.R. § 42.121(a)(3). There exists a "presumption .

. . that only one substitute claim would be needed to replace each challenged claim." 37 C.F.R. § 42.121(a)(3); 35 U.S.C. § 316(d)(1)(B); *Corning Optical Comm'n RF, LLC v. PPC Broadband, Inc.*, 2014 WL 5477766, IPR2014-00441, Paper 19 at 3 (P.T.A.B. Oct. 30, 2014) ("The presumption is that only one substitute claim is needed for each original patent claim."). As set forth in the claim listing attached at Appendix A, WiPQTUS proposes only one substitute claim for each Challenged Claim and conforms the other non-challenged claims dependent on claim 1 to be dependent on claim 21. Accordingly, WiPQTUS presents a reasonable number of substitute claims.

V. SUBSTITUTE CLAIMS DO NOT ADD NEW SUBJECT MATTER

The limitation that WiPQTUS proposes to add to substitute independent claim 21 comes directly from the U.S. Provisional Application 61/682,312 ("the '312 Provisional"), the '339 Patent's earliest priority application. For example, "comprised of two or more electrical components a collection of two or more electrical components from the list (i) one or more passive components, (ii) one or more active components, or (iii) one or more switches" in proposed substitute independent claim 21 comes directly from the '312 Provisional at [0024]:

[0024] The impedance network 101 comprises ***one or more of passive electronic components***, for example, a resistor, a capacitor, a magnetic device, a transducer, transformer etc.; ***active electronic***

components, for example, a diode, a transistor such as a metal oxide semiconductor field effect transistor (MOSFET), a bipolar transistor, etc., operational amplifiers, an optoelectronic device, etc., and **electronic switches**. These electronic components in combination are utilized to vary impedance of the dual mode wireless charging receiver 100 prior to transmitting power to a secondary wireless power receiver 300.

Ex. 2004, '312 Provisional, Para. 0024 (emphasis added); *see also* Ex. 1001, '339 Patent, Col. 9, ll. 4 – 14.

Also, the limitation “while configured to receive said power from the wireless power transmitter” can be found in the '312 Provisional and the specification of the '339 Patent. Ex. 2004, at [0004], (“In the charging mode, dual mode wireless charging receiver configures the first circuitry to receive the power... The first circuitry, based on an input from the control logic circuit is configured to change the impedance of the impedance network ... to obtain a modified form of the received power, and apply the modified form of the power to the load device...”), [0007], [0032]; *see also* Ex. 1001, Col. 2, ll. 37 – 46 (same).

Claim 3 as argued in Patent Owner's Response finds support only in the new matter added to the application for the '339 Patent as compared to the '312 Provisional and application for the '929 Patent that preceded it. Response p. 15. The only support for the phrase "a priori with fixed values" and "tuned" in reference to elements of the impedance network are as follows: Ex. 1001, '339

Patent, Col. 22, ll. 11 - 12; l. 55; Col. 24, ll. 7 - 8; Col. 24, l. 46; Col. 25, l. 18; l.

55. All these references are found in the material that was added to the disclosure found in the '312 Provisional and the '310 Application. Nevertheless, the amended claim 23 is supported by the aforementioned passages in the '339 Patent and does not constitute new matter.

Proposed substitute dependent claims 22, 24-32 are only amended to reflect their new dependency from the substitute independent claim 21. Therefore, these substitute dependent claims do not add new subject matter.

VI. PROPOSED SUBSTITUTE CLAIMS ARE SUBSTANTIALLY IDENTICAL TO THE ORIGINAL PATENT CLAIMS

As shown above, the proposed substitute claims serve to only to clarify and limit the claims to the claim construction proposed by the Patent Owner in its Response. Therefore, the proposed substitute claims are substantially identical to the original patent claims, and WiPQTUS requests determination that the amended claims and original patent claims are substantially identical within the meaning of 35 U.S.C. § 252. PTAB Consolidated Trial Practice Guide, 70; 84 Fed. Reg. 64,280 (Nov. 21, 2019).

VII. PROPOSED SUBSTITUTE CLAIMS RESPOND TO AND OVERCOME THE GROUNDS OF RECORD

The proposed substitute claims respond to the grounds of unpatentability involved in the trial. 37 C.F.R. § 42.121(a)(2). The burden of establishing the unpatentability of the amended claims is on Petitioner. 37 C.F.R. § 42.121(d)(2); *see also Aqua Products*, 872 F.3d at 1327-28. In any event, for the reasons stated in WiPQTUS's Response as summarized below, WiPQTUS's claim amendments overcome the only ground of record – whether “claims 1-3, 5, 7, and 9 are unpatentable under § 103 as obvious over Chatterjee and Corbridge.” Decision, p. 36.

A. Level of Ordinary Skill in the Art

In the Decision on institution, the Board restated the definition of the Person of Ordinary Skill in the Art (“POSITA”) provided by Dr. Phinney. For the purposes of this motion to amend only, the Patent Owner will rely on that definition provided.

B. Claim Construction

The substitute claims incorporate the claim constructions advocated by the Patent Owner and supported by the specification. Therefore, WiPQTUS does not believe that any of the limitations added to the substitute claims require any further

construction and should instead be construed in accordance with their ordinary meaning. *In re Bass*, 314 F.3d 575, 577 (Fed. Cir. 2002). However, if Petitioner proposes a construction for any claim term, WiPQTUS reserves the right to propose an alternative construction for that term.

C. Substitute Claims are Patentable Over the Cited Art.

Petitioner challenged original claims 1, 2, 3, 5, 7, and 9 of the '339 Patent as obvious in view of the combination of U.S. Patent Publication No. 2011/0018356 by Chatterjee et al. ("Chatterjee") in view of U.S. Patent Publication No. 2010/0083012 by Corbridge et al. ("Corbridge"). Decision, p. 36. WiPQTUS disagrees for the reasons set forth in its Patent Owner's Response, filed concurrently herewith. Because the proposed substitute claims incorporate only the claim construction advocated by the Patent Owner and supported by the specification, the substitute claims 21-32 are patentable over the cited art for the same reasons.

To summarize, the combination of Chatterjee and Corbridge does not render the Challenged Claims invalid. The combination does not disclose an "impedance network comprised of two or more electrical components from the list (i) one or more passive components, (ii) one or more active components, or (iii) one or more switches." See Response, pp. 50-63. As one example, as explained in the Patent

Owner's Response, Chatterjee's bi-directional coil assembly with a single capacitor and wire (as alleged by Dr. Phinney, Ex. 1002, ¶ 115 (in the configuration shown in Ex. 1003, Fig. 6B (see Ex. 1002, ¶ 113)) does not disclose the limitation of an impedance network which requires two or more electrical components. A wire does not constitute a component and a single capacitor does not constitute an impedance network comprised of two or more electrical components. Furthermore, as argued in the Response, passive elements alone, such as two or more capacitors, would not provide the functionality required by limitation [1.e]. Response, p. 54.

In addition, Chatterjee standing alone or in combination with Corbridge does not show the claim element of substitute claim 21 "first circuitry, based on an input from said control logic circuit, configured to change, while configured to receive said power, the impedance of said impedance network and topology of said switch network to obtain a modified form of said received power, and apply said modified form of said power to said load device;" See Response, pp. 55 – 63. As conceded by Petitioner's expert Dr. Phinney, Chatterjee "provides different impedance under different modes", not controlling the impedance in the same mode of operation. *Id.* p. 55. Furthermore, none of the circuits shown in Fig. 6A – D of Chatterjee (of which the Petitioner contends that the bi-directional coil assembly shown in Fig.

6B discloses the “impedance network”) is capable of changing the impedance while configured to receive power. *See Id.* pp. 57 – 63. Coils shown in Fig. 6A – D cannot constitute a part of the impedance network, and even if they were, there is no disclosure in Chatterjee to suggest that they are in any way configurable to be changed while power is being received as required by the limitation [1.e]. *Id.* Capacitors in Fig. 6A and 6B are unpowered, and passive components (such as capacitors, inductors, and resistors) that do not have current flowing through them cannot contribute to a circuit's impedance and, therefore, cannot be used to modify the form of received power, which is required by limitation [1.e]. *Id.* pp. 57 - 60 Finally, capacitors in Fig. 6C and 6D are either also unpowered or in no way configured to have its impedance changed as required by the limitation [1.e]. *Id.* pp. 60-63. Therefore, substitute claim 21 is patentable over the prior art.

The limitations added to claim 1 to yield substitute claim 21 place further restrictions on “impedance network” and limitation [1.e] that Patent Owner contends are present under a proper claim construction analysis of claim 1. To the extent this Board disagrees and finds the Challenged Claims to be unpatentable, Patent Owner requests that the substitute claims be entered as they expressly distinguish the claimed inventions from Chatterjee and Corbridge.

Furthermore, claim 3 was relied upon by the Board to initially reject Patent Owner's reasonable construction of claim 3. *See* Patent Owner WiPQTUS Inc.'s Preliminary Response, pp. 31 – 42; Decision, p. 27. In doing so, the Board improperly relied upon new matter added in the application for the '339 Patent, including Figs. 10A-H. *See* Decision, pp. 25-26. Substitute claim 23 merely clarifies claim 3 to resolve the ambiguity reflected by the two constructions, the Patent Owner's and the Board's or Petitioner's. Furthermore, the proposed substitute claim 23 including the amended limitations of claim 21 is narrower than the original claim 3.

Substitute dependent claims 22-32 depends upon substitute independent claim 21, and therefore overcomes the cited art for the same reason.

Therefore, the substitute claims 21-32 are patentable over the cited art.

VIII. DUTY OF CANDOR

As stated in the precedential Board decision *Lectrosonics*, IPR2018-01129, Paper 15 at 9-10, the Patent Owner must comply with the duty of candor under 37 C.F.R. § 42.11. In compliance therewith, WiPQTUS provides the invalidity contentions provided by Petitioner in the underlying district court litigation, which is now stayed pending the outcome of this proceeding. *See* Response, Related Proceedings, pp. 2 – 3. Petitioner's disclosures are provided as Ex. 2007.

WiPQTUS does **not** concede that any or all of the references that Petitioner relied upon qualify as prior art, and furthermore denies that any reference alone or in combination would render the claims unpatentable.

IX. CONCLUSION

For the foregoing reasons, WiPQTUS respectfully requests that, should any of the Challenged Claims be found unpatentable, the Board grant this contingent motion such that the '339 Patent is amended to include the corresponding substitute claims identified in the Claim Listing attached herewith as Appendix A.

Date: June 5, 2024

Respectfully Submitted,

/s/ Brian A. Carpenter
Brian A. Carpenter
USPTO Reg. No. 37,109

CERTIFICATE UNDER 37 C.F.R. § 42.24(d)

This Patent Owner's Contingent Motion to Amend Under 37 C.F.R. § 42.121 complies with the page limitation of 25 pages pursuant to 37 C.F.R. §§ 42.24(a)(1)(vi). As calculated by Microsoft Word, it contains 13 pages, excluding the parts exempted by 37 C.F.R. §§ 42.24(a).

/s/ Brian A. Carpenter
Brian A. Carpenter
USPTO Reg. No. 37,109

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on June 5, 2024 a copy of this CONTINGENT MOTION TO AMEND UNDER 37 C.F.R. § 42.121 was served on the following via electronic mail:

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LIST OF EXHIBITS

Exhibit Number	Exhibit
2007	Samsung's Invalidity Contentions dated 10/11/2023

APPENDIX A
CLAIM LISTING

Below are claim listing of proposed substitute claims 21-32 for claims 1-12.
Parentheses are used to indicate which claim is proposed to be substituted by the proposed substitute claims. Brackets are used to indicate deleted text. Underlines are used to indicate inserted text.

PROPOSED SUBSTITUTE CLAIMS

21. (proposed substitute for claim [1]) A dual mode wireless power receiver configured to selectively apply a received power to a load device and utilize at least a part of the stored power to power-up a secondary wireless power receiver and communicate with said secondary wireless power receiver to cause an action or transaction or charge said secondary wireless power receiver's load device, said dual mode wireless power receiver comprising:

one of coil and capacitor electrodes;

a first circuitry comprising:

an impedance network comprised of two or more electrical components from the list (i) one or more passive components, (ii) one or more active components, or (iii) one or more switches;

a switch network;

a filter capacitor;

a second circuitry comprising:

a control logic circuit; and

a modulator/demodulator circuit;

said first circuitry configured to receive said power from a wireless power transmitter;

said first circuitry, based on an input from said control logic circuit, configured to change, while configured to receive said power, the impedance of said impedance network and topology of said switch network to obtain a modified form of said received power, and apply said modified form of said power to said load device;

said first circuitry, based on an input from said control logic circuit, configured to change said topology of said switch network and said impedance of said impedance network to transmit at least part of said stored power to said secondary wireless power receiver to power-up said secondary wireless power receiver;

said second circuitry, on power-up of said secondary wireless power receiver, configured to identify a type of said secondary wireless power receiver and identify a wireless power protocol of said secondary wireless power receiver;

said second circuitry, configured to receive and interpret data from said secondary wireless power receiver in said identified wireless power protocol;

said second circuitry, based on said interpretation, configured to perform a function associated with said transmitted power in conjunction with said first circuitry.

22. (proposed substitute for claim [2]) The dual mode wireless power receiver of claim [1]21, wherein said switch network of said first circuitry is configured as one of an inverter and a rectifier.

23. (proposed substitute for claim [3]) The dual mode wireless power receiver of claim [1]21, wherein at least one of said one or more passive components of the impedance network of said first circuitry[comprising of elements that are one of] is (1) chosen a priori with a fixed value[values] and (2) tuned during operation over a range of values.

24. (proposed substitute for claim [4]) The dual mode wireless power receiver of claim [1]21, wherein said second circuitry additionally configured with security functions to authenticate, decrypt and encrypt a data transfer between said dual mode wireless power receiver and said secondary wireless power receiver, said second circuitry including said security functions in one of said control logic

circuit and an additional independent security engine block, said second circuitry, on receiving and interpreting said data from said secondary wireless power receiver in said identified wireless power protocol, configured to perform one of:

providing authentication information to said secondary wireless power receiver to authenticate said dual mode wireless power receiver, receiving, decrypting and interpreting said data from said secondary wireless power receiver and responding with suitable encrypted data to secondary wireless power receiver in said identified wireless power protocol;

initiating exchange of said authentication information between said dual mode wireless power receiver and said secondary wireless power receiver, to authenticate said dual mode wireless power receiver and said secondary wireless power receiver, receiving, decrypting and interpreting said data from said secondary wireless power receiver and responding with said encrypted data to secondary wireless power receiver in said identified wireless power protocol; and

performing function associated with said transmitted power in conjunction with said first circuitry.

25. (proposed substitute for claim [5]) The dual mode wireless power receiver of claim [1]21, wherein said first circuitry is further comprising one of switch_configuration_A and switch_configuration_B:

said switch_configuration_A comprising first switch and second switch,
said first switch operationally connecting and disconnecting said dual mode wireless power receiver with said stored power directly or via intermediate circuitry, and
said second switch operationally connecting and disconnecting said dual mode wireless power receiver with said load;
said switch_configuration_B comprising single switch,
said single switch operationally connecting and disconnecting said dual mode wireless power receiver with said load and said stored power, the connectivity being direct or via intermediate circuitry.

26. (proposed substitute for claim [6]) The dual mode wireless power receiver of claim [4]24, wherein said first circuitry is further comprising one of switch_configuration_A and switch_configuration_B:

said switch_configuration_A comprising first switch and second switch,

said first switch operationally connecting and disconnecting said dual mode wireless power receiver with said stored power directly or via intermediate circuitry, and

said second switch operationally connecting and disconnecting said dual mode wireless power receiver with said load;

said switch_configuration_B comprising single switch,

said single switch operationally connecting and disconnecting said dual mode wireless power receiver with said load and said stored power, the connectivity being direct or via intermediate circuitry.

27. (proposed substitute for claim [7]) The dual mode wireless power receiver of claim [1]21, wherein said first circuitry is further comprising a switch that connects and disconnects said dual mode wireless power receiver with said stored power, said connection and disconnection to said stored power being direct or indirect via other intermediate circuitry and a power regulation circuitry that connects and disconnects said dual mode wireless power receiver with said load.

28. (proposed substitute for claim [8]) The dual mode wireless power receiver of claim [4]24, wherein said first circuitry is further comprising a switch that connects and disconnects said dual mode wireless power receiver with said stored power, said connection and disconnection to said stored power being direct

or indirect via other intermediate circuitry and a power regulation circuitry that connects and disconnects said dual mode wireless power receiver with said load.

29. (proposed substitute for claim [9]) The dual mode wireless power receiver of claim [1]21, wherein said first circuitry is further comprising a power regulation circuitry that connects and disconnects said dual mode wireless power receiver with said load and connects and disconnects said dual mode wireless power receiver with said stored power, said connection and disconnection to said stored power being direct or indirect via other intermediate circuitry.

30. (proposed substitute for claim [10]) The dual mode wireless power receiver of claim [4]24, wherein said first circuitry is further comprising a power regulation circuitry that connects and disconnects said dual mode wireless power receiver with said load and connects and disconnects said dual mode wireless power receiver with said stored power, said connection and disconnection to said stored power being direct or indirect via other intermediate circuitry.

31. (proposed substitute for claim [11]) The dual mode wireless power receiver of claims [7 or 8 or 9 or 10]27 or 28 or 29 or 30, wherein said power regulation circuitry performing one of stepping up the voltage, stepping down the voltage, maintaining the voltage with low dropout and passing through the voltage

unchanged on the DC power that said power regulation circuitry delivers to said load.

32. (proposed substitute for claim [12]) The dual mode wireless power receiver of claims [7 or 8 or 9 or 10]27 or 28 or 29 or 30, wherein said power regulation circuitry performing one of stepping up the voltage, stepping down the voltage and passing through the voltage unchanged on the DC power that said power regulation circuitry receives from said stored power.