UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
----------X
ANKER INNOVATIONS LTD.,

Petitioner,

-against-

Case No.:
IPR2024-00994

POWERMAT TECHNOLOGIES LTD.,

Patent Owner.
----------X
DATE: May 14, 2025

TIME: 10:00 a.m.

CROSS EXAMINATION of GARY L. WOODS, Ph.D., by the Counsel for the Patent Owner, held remotely via Zoom Videoconference, before Suzanne Pastor, a Notary Public of the State of New York.

A P P E A R A N C E S:
(All appearances via Zoom)

FISH & RICHARDSON
Attorneys for the Petitioner
60 South 6th Street, Suite 3200
Minneapolis, Minnesota 55402
BY: NICHOLAS STEPHENS, ESQ.
612.766.2018
nstephens@fr.com

MAYER BROWN, LLP
Attorneys for the Patent Owner
1999 K Street, NW
Washington, D.C. 20006
BY: SORA KO, ESQ.
202.263.3308
sko@mayerbrown.com

* * *

THE REPORTER: Good morning. The attorneys participating in this deposition acknowledge that I am not physically present in the deposition room and that I will be reporting this deposition remotely.

They further acknowledge that in lieu of an oath administered in person, I will place the witness under penalty of perjury.

The parties and their counsel consent to this arrangement and waive any objections to this manner of reporting. Counsel, please indicate your agreement by stating your name and your agreement on the record.

MS. KO: Sora Ko for Powermat Technologies Ltd., and I agree.

MR. STEPHENS: Nicholas Stephens for petitioner Anker Technologies, we agree.

THE REPORTER: Doctor, please raise your right hand.

Do you swear or affirm that the testimony you are about to give will

be the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

EXAMINATION

BY MS. KO:

Q. Do you understand this deposition is being taken in relation to IPR 2024-00996?

A. I do.

Q. Is there any reason that you would not be able to testify truthfully today?

A. No.

Q. Have you been deposed before?

A. Yes.

Q. How many times have you been deposed before?

A. Either two or three. Let's say two.

Q. When most recently have you been deposed?

A. About two months ago in a case related to this one.

Q. And this IPR relates to U.S. Patent No. 8,626,461, is that correct?

A. Yes.
Q. If I refer to U.S. Patent No. 8,626,461 as the '461, will you understand this is the patent I'm referring to?
A. Yes.
Q. And I will understand if you do the same.
Today if I ask you about your opinions or your reports, last declaration or this case, can we agree that we are talking about this IPR specifically?
A. Yes.
Q. And if otherwise, I will specify. And I just ask that you please do the same.
A. Yes.
Q. We'll now turn to Exhibit 1003, Woods declaration.
(Whereupon, Declaration of Dr. Woods was marked as Woods Exhibit 1003 for identification as of this date by the Reporter.)
A. Okay.
Q. Do you recognize this as the

declaration you prepared for this matter?
A. Do you want to share my screen? Or --
Q. It's okay. If you have the Exhibit 1003 in front of you --
A. Yeah, yeah.
Q. -- that would be fine.
MR. STEPHENS: Dr. Woods, do you have a physical copy or an electronic copy of Exhibit 1003?
THE WITNESS: I do. I have both.
MR. STEPHENS: Okay.
Q. Can you let me know when you have it in front of you?
A. Oh, it's in front of me.
Q. Okay, so do you recognize this as the declaration you prepared for this matter?
A. Yes.
Q. When did you begin preparing this declaration?
A. Let's see, it was submitted in August of 2024. So I -- looking through my notes, I see notes going back at least to

May of 2024.

Q. Who asked you to prepare the declaration?

A. The law firm Fish & Richardson.

Q. In preparing this declaration, did you speak with anyone from Anker?

A. I did not.

Q. Did you speak with anyone who was not an attorney in relation to this IPR?

A. No.

Q. So starting on page 21 of Exhibit 1003, the Woods declaration, you have a section for an overview of the prior art. Do you see this?

A. Yes.

Q. In the section you first --

A. Wait, excuse me, let's see. Are you talking about -- let's see, I have that on page 13 of my dec. Are you referring to copies in -- I'm not sure what the discrepancy is.

Q. Okay, let's turn to page 21 of Exhibit 1003.

A. Anticipation based on Olson?

Q. Yes.
A. Okay, gotcha.
Q. So in this connection you identify Olson. When did you first become aware of the Olson reference?
A. Sometime between May of 2024 and August of 2024.
Q. And did you conduct a prior art search?
A. No, I did not conduct an independent prior art search.
Q. Was this reference provided to you by counsel?
A. Yes.
Q. Can we turn to page 39 of the Woods declaration, Exhibit 1003.
A. Okay.
Q. Here you identify the Stevens reference, Exhibit 1005. Was this reference also provided to you by counsel?
A. Yes.
Q. Can we turn to page 68 of Exhibit 1003.
A. Okay.
Q. Here you describe Jin, Exhibit

1006. Was this reference also provided to you by counsel?

A. Yes.

Q. Were any of the exhibits not provided to you by counsel?

A. No. Well, except my CV I guess.

Q. Okay. Can we turn to page 24 of Exhibit 1003.

A. Page 24 you said?

Q. Yes.

A. Application of Olson.

Q. Paragraphs 39 to paragraph 41.

A. Yes.

Q. You discuss application of Olson in relation to the preamble of claim 13, is that correct?

A. Yes.

Q. Is it your position that Olson explicitly discloses the preamble of claim 13?

A. Yes.

Q. You do not identify any theory of inherency in these paragraphs, is that correct?

A. I'm not sure what you mean. I'm not a lawyer.

Q. You do not use the words "inherent," "inherency" or other variations of the word in these paragraphs, is that correct?

A. I don't think so. Let me check to be sure.

Yes, I agree. I did not use "inherency" or any form of that word with respect to claim 13.

Q. And can we turn to page 27.

A. Okay.

Q. Here you describe the application of Olson in relation to element 13.1, is that correct?

A. Yes.

Q. Your position in relation to these paragraphs is that Olson explicitly discloses element 13.1, is that correct?

A. Yes.

Q. And you do not establish any theory of inherency or mention the word "inherency" in relation to these paragraphs, is that correct?

MR. STEPHENS: Objection.

A. I don't mention the word "inherency" or any relation, no.

Q. Dr. Woods, is it your position that a current measurement alone can disclose a power measurement?

A. With respect to -- you mean with respect to the context of the '461 patent? Or in general?

Q. Let's say with respect -- let's say in general.

A. Well, I would say with respect to the '461 patent, a POSITA would say that a current measurement is effectively the same as a power measurement. But in a general case, that's not necessarily true.

Q. In element 13.1 you describe the use of current and voltage together to disclose the power measurement, is that correct?

A. Which paragraph are you pointing me to?

Q. Paragraph 42.

A. And the question was whether I disclose current and voltage?

Q. Yes. So looking at three sentences in, you describe that Olson teaches that the current measure block 226 measures current 212 volt power supply 216 which is used in the calculation of the power in measure.

A. Yes.

Q. You're using the calculation of current and voltage together to disclose the measurement of power in element 13.1, is that correct?

A. Well, I would say -- I mean, that's what Olson teaches, yes.

Q. You are relying on both the current measure block 226 as well as the micro processor 212 to disclose at least one input power monitor in relation to element 13.1, is that correct?

A. Yes. Yes, the microprocessor performs a calculation and measures the voltage, and block 226 measures the current.

Q. This is because you are not relying on the current measurement of Olson alone to disclose the power measurement, is

that correct?

A. The way I would put it is Olson teaches both voltage and power. But he doesn't need any detail on voltage because the voltage is known and constant.

Q. You rely specifically on a calculation in relation to this element, is that correct?

A. By "I" you mean Olson relies on a calculation. Is that what you're asking?

Q. Yes.

A. Yes.

Q. Is it not your position that voltage alone is a measurement of power, is that correct?

A. No. To a POSITA in general, in order to measure power into something, you need voltage and current, as I stated before. Specifically Olson, the voltage is constant, so to measure the power it's the same thing effectively as just measuring the current.

Q. And can you turn to page 29.

A. Okay.

Q. This describes your application

of Olson to element 13.2, is that correct?

A. Yes.

Q. And it is your position that Olson explicitly discloses element 13.2, is that correct?

MR. STEPHENS: Object to the form.

A. Yes.

Q. And you do not articulate any theory of inherency in relation to this element, is that correct?

MR. STEPHENS: Objection; form.

A. Are you objecting to -- I'm sorry, you're asking me about whether I use the word "inherent" or any variation thereof?

Q. Yes, in relation to this paragraph.

A. Yes, I do not use the word "inherency" or any variation thereof.

Q. Turn to the next page, page 30. This describes your application of Olson to element 13.3, is that correct?

A. Yes.

Q. It is your position here that

Olson explicitly discloses element 13.3, is that correct?

MR. STEPHENS: Objection; form.

A. Yes.

MR. STEPHENS: Give me a moment to enter an objection.

Objection to form.

Q. Dr. Woods, do you use the words "inherency," "inherent" or other variations thereof in paragraphs 46 or 47?

A. I do not.

Q. Can you turn to page 31.

A. Okay.

Q. Here you describe Olson in relation to element 13.4, is that correct?

A. Yes.

Q. And your opinions here are directed to the argument that Olson explicitly discloses element 13.4, is that correct?

MR. STEPHENS: Objection; form.

A. Yes.

Q. And you do not use the words "inherent," "inherency" or any variation thereof in relation to these paragraphs, is

that correct?

A. Yes, correct.

Q. Can we turn to page 33.

A. Okay, I'm there.

Q. Here you begin your discussion of Olson in relation to element 14, is that correct?

A. Yes.

Q. This limitation is related to conductive power outlet of claim 13 additionally comprising at least one circuit breaker configured to connect the primary coil to the power supply, is that correct?

A. Yes.

Q. And in this section your argument is that Olson explicitly discloses element 14, is that correct?

A. Yes.

Q. In these paragraphs you do not articulate an argument that Olson inherently discloses element 14, is that correct?

MR. STEPHENS: Objection; form.

A. You're asking me again whether

I use the word "inherent" or any variation thereof?

Q. Yes.

A. No, I do not use the word "inherent" or any variation thereof.

Q. Do you identify any component that is missing in Olson in relation to this claim element?

A. Meaning basically circuit breaker or primary coil or power supply?

Q. Yes.

A. I identify all three of those structures.

Q. You identify all three of these structures as explicitly disclosed in Olson, is that correct?

MR. STEPHENS: Objection; form.

A. Yes, including the elements identified in claim 13.

Q. And can we turn to page 35.

A. Okay.

Q. Here you describe Olson in relation to element 15.1, is that correct?

A. Yes.

Q. It is your position here that

Olson explicitly discloses element 15.1, is that correct?

A. Yes.

Q. And you do not use the words "inherent," "inherently" or any variation thereof in relation to this paragraph, is that correct?

A. Correct.

Q. You do not identify any missing portion of Olson in relation to this section, is that correct?

A. Okay, that's kind of a vague question. Can you be specific? You're asking whether I identify inductive power receiver, a secondary coil and a primary coil in an electric load?

Q. Yes.

A. The elements of element 15.1?

Q. Yes.

A. And the question was do I identify anything missing from those?

Q. Yes.

A. No. Referring back to the inductive power outlet of claim 13, I identified between 15.1 and my previous

discussion of element 13 -- claim 13, I've identified all those elements.

Q. Okay. Can we turn to page 36.

A. Okay.

Q. Starting at paragraph 54, you discuss the application of Olson in relation to element 15.1, is that correct?

A. You said page -- I'm sorry, page -- what page?

Q. Excuse me, page 36, and paragraph 54.

A. Starting at 54 I discuss element 15.2.

Q. Yes, I see that. It is your position in relation to 15.2 that Olson expressly discloses element 15.2, is that correct?

A. Yes.

Q. And you do not put forth any theory of inherency in relation to this paragraph, is that correct?

MR. STEPHENS: Objection; form.

A. Again, I don't use the term "inherency" or any variation thereof. Is that your question?

Q. That is part of my question.
A. Okay, yes, I do not use the word "inherency" or any variation thereof with respect to discussion of element 15.2.
Q. And you do not describe any portion of element 15.2 -- excuse me, strike that.
You do not identify any part of element 15.2 that you say Olson is silent in respect to, is that correct?
A. Yes. Including my discussion of claim 13, as I state in paragraph 54. Olson discloses all -- Olson discloses all the elements of 15.2.
Q. And turn to page 37.
A. Okay.
Q. Starting at paragraph 55, you describe your application of Olson in relation to element 15.3, is that correct?
A. Yes.
Q. And it is your position that Olson expressly discloses element 15.3, is that correct?
A. Yes.
Q. And you do not use the words

"inherent," "inherency" or a variation thereof in relation to this claim element in Olson, is that correct?

A. Yes, that is correct.

Q. Can we turn to page 38.

A. Okay. I'm at 38.

Q. On paragraph 56 on page 38 you describe your application of Olson in relation to element 16, is that correct?

A. Yes.

Q. And it is your position that Olson expressly discloses element 16, is that correct?

A. Yes.

Q. And you do not use the words "inherent," "inherency" or variations thereof in relation to this claim element, is that correct?

A. Yes, that is correct.

Q. Turning to page 39, starting at paragraph 57, you describe the application of Olson in relation to element 18, is that correct?

A. Yes.

Q. In this paragraph you

incorporate by reference your opinions in relation to elements 13.P and 15.1 to 15.2, is that correct?

A. Yes. I also incorporate references to some paragraphs and figures from Olson.

Q. Can you turn to page 9 of your declaration.

A. Okay.

Q. In paragraph 16 you state that "I have been informed that a patent claim is unpatentable as anticipated under 35 USC, Section 102 if each and every element of a claim is found either explicitly or inherently in a single prior art reference," is that correct?

A. Yes.

Q. And can you turn to page 27 of Olson.

A. Page 27 of the Olson --

Q. Excuse me, sorry. Can you turn to page 27 of your declaration.

A. Okay.

Q. Excuse me, can you actually turn to page 32 of your declaration.

A. Yes. I'm there.
Q. Starting in paragraph 49 --
A. Yes.
Q. -- you describe that there is a change in terminology between paragraphs 74 to 76 of Olson and paragraph 112 of Olson, is that correct?
A. Yes.
Q. You state that paragraph 112 is actually consistent with the earlier paragraphs of 74 to 76 of Olson, is that correct?
A. Yes.
Q. So it is your position that these are directed towards the same calculation, is that correct?
A. Calculation of a power loss index such as efficiency quotient Q or efficiency differential delta. Yes. All those paragraphs are directed to the same measurements.
Q. And can we turn to page 39 of your declaration.
A. Okay.
Q. Here you begin your analysis in

relation to ground 1-B, is that correct?

A. Yes, Olson and Stevens.

Q. Can we turn to page 49 of your declaration.

A. Okay.

Q. This begins your analysis of ground 2 obviousness based on Stevens and Olson, is that correct?

A. Yes.

Q. Can you pull Exhibit 1004, the Olson reference.

(Whereupon, Olson Reference was marked as Woods Exhibit 1004 for identification as of this date by the Reporter.)

A. Give me a moment.

Okay. I have Olson.

Q. Can you turn to page 17 of Exhibit 1004, and I'm referring to the page numbers at the bottom of the page.

A. I don't have a PDF with page numbers at the bottom.

Q. Okay, can you turn to page 1 of Olson.

A. Just the title page?

Q. Where it starts the written description after all the figures.
A. Okay. Using the page number at the top.
Q. Yes.
A. Page 1. It starts with "system and method for transcutaneous energy transfer."
Q. Yes.
A. Okay.
Q. Can you look at paragraph 1 of Olson.
A. Yes.
Q. This describes that the invention is related to implantable medical devices, is that correct?
A. Yes.
Q. And specifically, it describes energy transfer; devices, systems and methods for implantable medical devices, is that correct?
A. Yes. That's what paragraph 1 says.
Q. Can you turn to page 8 of the Olson reference.

A. With paragraph 78 -- 76 near the top?
Q. Yes.
A. Okay.
Q. Can you take a moment to look at paragraph 85 and read over this paragraph.
A. Okay.
(The witness reviews the document.)
Okay, I've read paragraph 85.
Q. There is no mention of a specific switch component in this paragraph, is that correct?
A. Not in this paragraph.
Q. Can you turn to paragraph 105 on page 11 of Olson.
A. Okay. I'm there.
Q. Can you take a moment to read over this paragraph.
A. Okay.
(The witness reviews the document.)
Okay, I've read paragraph 105.
Q. There is no mention of a

specific switch component in this paragraph, is that correct?

A. Well, there's mention control circuitry which a POSITA would understand to include a switch.

Q. A specific component of Olson with a reference number in relation to a switch is not articulated in this paragraph, is that correct?

A. Well, paragraph 105 explicitly uses the word "switching." Are you asking where in the system a POSITA would understand the switch to be located?

Q. I'm asking you if in paragraph 105 they articulate a specific switch component with a reference number.

A. They indicate a switch -- they indicate switching is going on, but there's no reference number.

Q. Can you turn to paragraph 110 on the same page.

A. Okay.

Q. And can you take a moment to look over this paragraph.

A. Okay.

(The witness reviews the document.)

Okay. I've read paragraph 110.

Q. There is no mention of a specific switch component in paragraph 110 of Olson, is that correct?

A. Let me see. I guess first of all, let me take a step back. So I didn't refer to paragraph 110 of Olson in my declaration, so you're asking me -- so this is technically outside the scope of my declaration. But you want to know whether paragraph 110 explicitly has a switch?

Q. It mentions a specific switch component.

A. Mentions a specific switch component. Let's see. Paragraph 110 does not mention a specific switching component. Not with a reference number anyway.

Q. And you stated that you did not rely on paragraph 110, and it is outside the scope of your declaration?

A. I guess I won't 100 percent assert that. I don't remember if I ever called out paragraph 110 or not. I

certainly called out nearby paragraphs, so. I don't see 110 explicitly listed but I certainly relied on nearby paragraphs.

Q. Can we turn back to your declaration.

A. Yes.

Q. Can we turn to ground 2.

A. Page number?

Q. Starting on page 52 where you describe the application of the predictable Stevens-Olson combination.

A. Yes, I'm there.

Q. Can we actually turn to page 53, the next page.

A. Yes.

Q. In paragraph 82, the first sentence says, "The primary unit 10 comprises a primary coil and electrical drive unit 14, a control unit 16 and a power measurement unit 100." Can you see that?

A. Yes.

(Whereupon, Stevens Reference was marked as Woods Exhibit 1005 for identification as of this date by the

IPR2024-00996
Powermat Ex. 2004
Page 29 of 52

Reporter.)

Q. And do you cite Exhibit 1005, the Stevens reference, on page 21, lines 22 to 23 and figure 4?

A. In paragraph 81 I cite Exhibit 105, figure 4 and page 21, paragraphs 13 to 15. I think that's different than what you said.

Q. Paragraph 82?

A. I'm talking about paragraph 81 of my dec. Are you talking about paragraph 82?

Q. Can you turn to paragraph 82.

A. Okay. Oh, I see it there. Exhibit 105, page 21, lines 22 to 23. Is that what you're referring to?

Q. Yes.

A. Okay.

Q. When you refer to page number 21 in Stevens, are you referring to the page number on the top of the page or the page number at the bottom of the page?

MR. STEPHENS: Can I clarify? Are you asking about page numbers or column numbers?

MS. KO: It's my understanding with Stevens that these were page numbers because there's only one column.

A. So you're asking about page 21 of Stevens as measured, and your question was whether it's the page number at the top or bottom?

Q. Yes. Let me ask this. Do you have any page numbers on the bottom of the pages of your Exhibit 1005?

A. No. So I believe I'm referring to the page numbers that are at the top.

Q. So whenever you cite to Stevens and you refer to page numbers in Stevens, you're referring to the page numbers at the top, is that correct?

A. It's been a while since I've written this, but yes, I believe that must be correct.

MS. KO: Can we go off the record, please.

(Whereupon, a short recess was taken.)

BY MS. KO:

Q. Dr. Woods, can you turn to page 52 of your declaration.
A. Okay.
Q. Did you have any discussions with counsel during the break?
A. No.
Q. In paragraph 52 you describe the application of your Stevens-Olson combination in relation to element 13.P, the preamble of claim 13, is that correct?
A. Yes.
Q. And in relation to the preamble in ground 2, you only cite Stevens in relation to the preamble, is that correct?
A. Yes, I believe that's correct.
Q. And turning to page 55, in paragraph 85 you describe Stevens in relation to element 13.1, is that correct?
A. Yes.
Q. And you only cite Stevens in relation to element 13.1, is that correct?
A. Yes.
Q. Now, on the same page, starting at paragraph 86 you describe the application of your combination of Stevens

and Olson in relation to element 13.2, is that correct?

A. Yes.

Q. And you only cite Stevens in relation to this element 13.2, is that correct?

A. Yes.

Q. Now turning to page 60 --

A. Okay.

Q. -- starting at paragraph 91, and I guess ending at paragraph 91 you discuss Stevens in relation to element 14, is that correct?

A. With respect to element 14, claim 14 you said?

Q. Yes.

A. Yes, I do discuss that.

Q. And you do not -- excuse me, and you only cite Stevens in relation to this element or claim 14, is that correct?

A. Yes.

Q. On the same page, starting at paragraph 92 you describe element 15.1 and your application of the Stevens-Olson combination in relation to element 15.1, is

that correct?

A. Yes.

Q. And you only cite Stevens in relation to element 15.1, is that correct?

A. Yes.

Q. On page 61, next page, starting at paragraph 93 you discuss element 15.2 in relation to ground 2, is that correct?

A. Yes.

Q. In relation to this limitation 15.2, you only cite Stevens in relation to this element, is that correct?

A. Yes.

Q. And turning to page 62, starting at paragraph 95 you discuss element 15.3 in relation to ground 2, is that correct?

A. Yes.

Q. And you only cite Stevens in relation to element 15.3, is that correct?

A. Yes.

Q. Turning to page 64, starting at paragraph 97 you discuss Stevens in relation to limitation 16, is that correct?

A. Yes.

Q. And you only cite Stevens in relation to claim 16, is that correct?
A. Yes.
Q. And on the same page, starting at paragraph 98 you describe element 17.1 in relation to ground 2, is that correct?
A. Yes.
Q. And in relation to this limitation you only cite Stevens, is that correct?
A. Yes, that is correct.
Q. Turning to page 66, starting in paragraph 100 you discuss element 17.2 in relation to ground 2, is that correct?
A. Yes.
Q. In relation to element 17.2 you only cite Stevens, is that correct?
A. Yes, that is correct.
Q. And turning to page 68, in paragraph 102 you describe claim 18 in relation to ground 2, is that correct?
A. Yes.
Q. And in this ground you cite only Stevens in relation to claim 18, is that correct?

A. Yes.

Q. As you can see on page 68, halfway down this starts your analysis based on Stevens and Jin ground 3, is that correct?

A. Yes.

Q. Can you flip to page 71 of your declaration. In paragraph 109 you describe ground 3 in relation to 13.P, the preamble of claim 13, is that correct?

A. Yes.

Q. And you rely exclusively on Stevens in relation to this element, is that correct?

A. Yes.

Q. And turning to paragraph 110 and element 13.1, here you describe ground 3 in relation to element 13.1, is that correct?

A. Yes.

Q. And here you rely exclusively on Stevens in relation to element 13.1, is that correct?

A. Yes.

Q. And at the bottom of page 71,

in paragraph 111 you describe element 13.2 in relation to ground 3, is that correct?

A. Yes.

Q. And in relation to this limitation you rely exclusively on Stevens, is that correct?

A. Yes.

Q. And turning to page 74 --

A. Okay.

Q. -- in paragraph 115 you discuss element 14 -- excuse me, claim 14 in relation to ground 3, is that correct?

A. Yes.

Q. And you rely exclusively on Stevens in relation to claim 14, is that correct?

A. Yes.

Q. In paragraph 116 you discuss element 15.1 in relation to ground 3, is that correct?

A. Yes.

Q. In relation to this limitation, 15.1, you only cite Stevens, is that correct?

A. Yes.

Q. And starting at paragraph 117 on the same page you discuss element 15.2 in relation to ground 3, is that correct?
A. Yes.
Q. And you exclusively rely on Stevens in relation to element 15.2, is that correct?
A. Yes.
Q. Turning to the next page, 75.
A. Okay.
Q. In paragraph 118 you discuss element 15.3 in relation to ground 3, is that correct?
A. Yes.
Q. And you rely exclusively on Stevens in relation to element 15.3, is that correct?
A. Yes.
Q. In paragraph 119 you describe claim 16 in relation to ground 3, is that correct?
A. Yes.
Q. And you rely exclusively on Stevens in relation to claim 16, is that correct?

A. Yes.

Q. And turning to claim 17, in paragraphs 120 and 121 you describe element 17.1 and 17.2 of claim 17 in relation to ground 3, is that correct?

A. Yes.

Q. And you rely exclusively on Stevens in relation to these limitations, is that correct?

A. Yes.

Q. Turning to page 76, in paragraph 122 you describe claim 18 in relation to ground 3, is that correct?

A. Yes.

Q. And you exclusively rely on Stevens in relation to claim 18 for ground 3, is that correct?

A. Yes.

MS. KO: Can we go off the record.

(Whereupon, an off-the-record discussion was held.)

BY MS. KO:

Q. So Dr. Woods, what is zero divided by 10?

A. Zero.
Q. What is zero divided by 100?
A. Zero.
Q. What is zero divided by a thousand?
A. Zero.
Q. The answer to all three is zero, is that correct?
A. Yes.
MS. KO: I pass the witness.
(Continued on the following page to include jurat.)
MR. STEPHENS: No further questions. Off the record.
(Whereupon, at 11:30 a.m. the examination of this witness was concluded.)

° ° ° °

D E C L A R A T I O N

I hereby certify that having been first duly sworn to testify to the truth, I gave the above testimony.

I FURTHER CERTIFY that the foregoing transcript is a true and correct transcript of the testimony given by me at the time and place specified hereinbefore.

_____
GARY L. WOODS, Ph.D.

Subscribed and sworn to before me

this _____ day of _____ 20___.

_____
NOTARY PUBLIC

E X H I B I T S

WOODS EXHIBITS		PAGE
Exhibit 1003	Declaration of Dr. Woods	5
Exhibit 1004	Olson Reference	24
Exhibit 1005	Stevens Reference	29

(Exhibits accompany the transcript.)

I N D E X

EXAMINATION BY	PAGE
Ms. Ko	4

INFORMATION AND/OR DOCUMENTS REQUESTED

(None)

C E R T I F I C A T E

STATE OF NEW YORK)
: SS.:
COUNTY OF DELAWARE)

I, SUZANNE PASTOR, a Notary Public for and within the State of New York, do hereby certify:

That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this day, May 14, 2025.

Suzanne Pastor
SUZANNE PASTOR

Exhibits

EX 1003 Gary L. Woods, Ph. D. 051425
5:18,21,22 6:5,10 7:13, 24 8:16,23 9:9 42:3
EX 1004 Gary L. Woods, Ph. D. 051425
24:10,13,19 42:4
EX 1005 Gary L. Woods, Ph. D. 051425
8:19 29:24 30:2 31:11 42:5

1

1
24:23 25:6, 11,22
1-B
24:1
10
29:17 39:25
100
28:23 29:20 35:13
1003
5:18,22 6:5, 10 7:13,24 8:16,23 9:9
1004
24:10,13,19
1005
8:19 29:24 30:2 31:11
1006
9:1
102
22:13 35:20
105
26:16,24 27:10,15 30:6,15
109
36:8
11
26:17
110
27:20 28:3, 5,9,13,17, 21,25 29:2 36:16
111
37:1
112
23:6,9
115
37:10
116
37:18
117
38:1
118
38:11
119
38:19
120
39:3
121
39:3
122
39:12
13
7:20 9:17,21 10:11 16:10 17:19 18:24 19:1 20:12 30:6 32:10 36:10
13.1
10:16,20 11:17 12:10, 18 32:18,21 36:17,18,22
13.2
14:1,4 33:1, 5 37:1
13.3
14:23 15:1
13.4
15:15,19
13.P
22:2 32:9 36:9
14
16:6,18,22 29:19 33:12, 14,15,20 37:11,15
15
30:7
15.1
17:23 18:1, 18,25 19:7 22:2 33:23, 25 34:4 37:19,23
15.2
19:13,15,16 20:4,6,9,14 22:2 34:7,11 38:2,6
15.3
20:19,22 34:16,20 38:12,16
16
21:9,12 22:10 29:19 34:24 35:2 38:20,24
17
24:18 39:2,4
17.1
35:5 39:4
17.2
35:13,16 39:4
18
21:22 35:20, 24 39:12,16

2

2
24:7 29:7 32:13 34:8, 16 35:6,14, 21
2024
6:24 7:1 8:6,7
2024-00996
4:8
21
7:12,23 30:3,6,15,20 31:5
212
12:4,16
216
12:4
22
30:3,15
226
12:3,15,21
23
30:4,15
24
9:8,10
27
10:12 22:18, 20,22
29
13:23

3

3
36:4,9,18 37:2,12,19 38:3,12,20 39:5,13,17
30
14:21
31
15:12

32
22:25
33
16:3
35
17:20 22:12
36
19:3,10
37
20:15
38
21:5,6,7
39
8:15 9:13
21:20 23:22

4

4
30:4,6
41
9:13
42
11:23
46
15:10
461
5:3 11:8,13
47
15:10
49
23:2 24:3

5

52
29:9 32:2,7
53
29:14
54
19:5,11,12
20:12
55
20:17 32:16
56
21:7
57
21:21

6

60
33:8
61
34:6
62
34:14
64
34:22
66
35:12
68
8:22 35:19
36:2

7

71
36:7,25
74
23:5,11 37:8
75
38:9
76
23:6,11 26:1
39:11
78
26:1

8

8
25:24
8,626,461
4:25 5:3
81
30:5,10
82
29:16 30:9,
12,13
85
26:6,11
32:17
86
32:24

9

9
22:7
91
33:10,11
92
33:23
93
34:7
95
34:15
97
34:23
98
35:5

A

able
4:11
acknowledge
3:3,7
additionally
16:11
administered
3:8
affirm
3:24
ago
4:22
agree
3:18,21 5:11
10:9
agreement
3:15,16
analysis
23:25 24:6
36:3
Anker
3:20 7:6
anticipated
22:12
Anticipation
7:25
anyone
7:6,8
application
9:12,15
10:15 13:25
14:22 19:6
20:18 21:8,
21 29:10
32:8,25
33:24
argument
15:18 16:17,
21
arrangement
3:12
art
7:15 8:8,11
22:15
articulate
14:9 16:21
27:15
articulated
27:8
asked
7:2
asking
13:10 14:14
16:25 18:14
27:11,14
28:10 30:24
31:5
assert
28:24
attorney
7:9
attorneys
3:2
August
6:24 8:7
aware
8:5

B

back
6:25 18:23 28:8 29:4
based
7:25 24:7 36:4
basically
17:9
begin
6:21 16:5 23:25
begins
24:6
believe
31:12,19 32:15
block
12:3,15,21
bottom
24:20,22 30:22 31:8, 10 36:25
break
32:5
breaker
16:12 17:10

C

calculation
12:5,8,20 13:7,10 23:16,17
called
28:25 29:1
case
4:22 5:11 11:16
certainly
29:1,3
change
23:5
check
10:7
circuit
16:12 17:9
circuitry
27:4
cite
30:2,5 31:14 32:13,20 33:4,19 34:3,11,19 35:1,9,17,23 37:23
claim
9:16,20 10:11 16:10 17:8,19 18:24 19:1 20:12 21:2, 17 22:11,14 32:10 33:15, 20 35:2,20, 24 36:10 37:11,15 38:20,24 39:2,4,12,16
clarify
30:23
coil
16:13 17:10 18:15,16 29:18
column
30:25 31:4
combination
29:11 32:9, 25 33:25
component
17:6 26:13 27:1,6,16 28:5,15,17, 18
comprises
29:18
comprising
16:11
conduct
8:8,10
conductive
16:10
configured
16:12
connect
16:12
connection
8:3
consent
3:12
consistent
23:10
constant
13:5,20
context
11:8
control
27:3 29:19
copies
7:21
copy
6:9,10
correct
4:25 9:17,25 10:6,16,20, 25 11:20 12:11,18 13:1,8,15 14:1,5,11,23 15:2,15,20 16:1,2,7,14, 18,23 17:16, 23 18:2,7,8, 11 19:7,17, 21 20:10,19, 23 21:3,4,9, 13,18,19,23 22:3,16 23:7,12,16 24:1,8 25:16,21 26:14 27:2,9 28:6 31:17, 20 32:10,14, 15,18,21 33:2,6,13,20 34:1,4,8,12, 17,20,24 35:2,6,10, 11,14,17,18, 21,25 36:5, 10,14,19,23 37:2,6,12, 16,20,24 38:3,7,13, 17,21,25 39:5,9,13,17
counsel
3:11,14 8:13,20 9:2, 5 32:5
current
11:5,14,18, 25 12:3,4,9, 15,22,24 13:18,22
CV
9:6

D

date
5:23 24:14 29:25
dec
7:20 30:11
declaration
5:10,19,20 6:1,18,22 7:3,5,13 8:16 22:8, 22,25 23:23 24:4 28:10, 12,22 29:5 32:2 36:8
delta
23:19
deposed
4:14,17,21
deposition
3:3,4,6 4:7
describe
8:25 10:14 11:17 12:2

15:14 17:22 20:5,18 21:8,21 23:4 29:10 32:7, 17,24 33:23 35:5,20 36:8,17 37:1 38:19 39:3, 12
describes 13:25 14:22 25:14,18
description 25:2
detail 13:4
devices 25:16,19,20
different 30:7
differential 23:19
directed 15:18 23:15, 20
disclose 11:6,19,25 12:9,16,25
disclosed 17:15
discloses 9:20 10:20 14:4 15:1,19 16:17,22 18:1 19:16 20:13,22 21:12
discrepancy 7:22
discuss 9:15 19:6,12 33:12,17 34:7,15,23 35:13 37:10, 18 38:2,11
discussion 16:5 19:1 20:4,11 39:22
discussions 32:4
divided 39:25
Doctor 3:22
document 26:10,23 28:2
drive 29:19

E

earlier 23:10
effectively 11:14 13:21
efficiency 23:18,19
either 4:18 22:14
electric 18:16
electrical 29:18
electronic 6:10
element 10:15,20 11:17 12:10, 18 13:7 14:1,4,11,23 15:1,15,19 16:6,18,22 17:8,23 18:1,18 19:1,7,13,16 20:4,6,9,19, 22 21:2,9, 12,17,22 22:13 32:9, 18,21 33:1, 5,12,14,20, 23,25 34:4, 7,12,16,20 35:5,13,16 36:13,17,18, 22 37:1,11, 19 38:2,6, 12,16 39:3
elements 17:18 18:18 19:2 20:14 22:2
ending 33:11
energy 25:7,19
enter 15:6
establish 10:22
EXAMINATION 4:4
exclusively 36:12,21 37:5,14 38:5,15,23 39:7,15
excuse 7:18 19:10 20:6 22:21, 24 33:18 37:11
Exhibit 5:18,21 6:5, 10 7:13,24 8:16,19,23, 25 9:9 24:10,13,19 29:24 30:2, 5,15 31:11
exhibits 9:4
explicitly 9:20 10:19 14:4 15:1,19 16:17 17:15 18:1 22:14 27:10 28:13 29:2
expressly 19:16 20:22 21:12

F

figure 30:4,6
figures 22:5 25:2
fine 6:7
firm 7:4
first 7:17 8:4 28:7 29:16
Fish 7:4
flip 36:7
form 10:10 14:7, 12 15:3,7,21 16:24 17:17 19:22
forth 19:19
found 22:14
front 6:5,15,16

G

general 11:9,11,16 13:16
give 3:25 15:5 24:16
going 6:25 27:18
Good 3:1

gotcha
8:2
ground
24:1,7 29:7 32:13 34:8, 16 35:6,14, 21,23 36:4, 9,17 37:2, 12,19 38:3, 12,20 39:5, 13,16
guess
9:7 28:7,23 33:11

H

halfway
36:3
hand
3:23
held
39:22

I

identification
5:22 24:14 29:25
identified
17:19 18:25 19:2
identify
8:4,18 9:23 17:6,12,14 18:9,14,21 20:8
implantable
25:15,20
include
27:5
including
17:18 20:11
incorporate
22:1,4
independent
8:11
index
23:18
indicate
3:14 27:17, 18
inductive
18:14,24
informed
22:11
inherency
9:24 10:4, 10,23,24 11:3 14:10, 20 15:9,24 19:20,24 20:3 21:1,16
inherent
10:4 14:15 15:9,24 17:1,5 18:5 21:1,16
inherently
16:22 18:5 22:15
input
12:17
invention
25:15
IPR
4:8,24 5:12 7:10

J

Jin
8:25 36:4

K

kind
18:12
know
6:14 28:12
known
13:5
Ko
3:17 4:5 31:1,21,25 39:19,23

L

law
7:4
lawyer
10:2
lieu
3:8
limitation
16:9 34:10, 24 35:9 37:5,22
limitations
39:8
lines
30:3,15
listed
29:2
load
18:16
located
27:13
look
25:11 26:5 27:24
looking
6:24 12:1
loss
23:17

M

manner
3:13
marked
5:21 24:13 29:24
matter
6:1,19
mean
10:1 11:7 12:12 13:9
Meaning
17:9
measure
12:3,6,15 13:17,20
measured
31:6
measurement
11:5,6,14, 15,19 12:10, 24,25 13:14 29:20
measurements
23:21
measures
12:4,20,21
measuring
13:21
medical
25:15,20
mention
10:23 11:2 26:12,25 27:3 28:4,18
mentions
28:14,16
method
25:7
methods
25:20
micro
12:16
microprocessor
12:19
missing
17:7 18:9,21
moment
15:5 24:16 26:5,19 27:23
monitor
12:17
months
4:22

morning
3:1

N

name
3:15
nearby
29:1,3
necessarily
11:16
need
13:4,18
Nicholas
3:19
notes
6:25
number
25:3 27:7, 16,19 28:19 29:8 30:19, 21,22 31:7
numbers
24:20,22 30:24,25 31:3,10,13, 15,16

O

oath
3:8
Object
14:6
objecting
14:13
objection
11:1 14:12 15:3,6,7,21 16:24 17:17 19:22
objections
3:13
obviousness
24:7
off-the-record
39:21
okay
5:24 6:4,13, 17 7:23 8:2, 17,24 9:8 10:13 13:24 15:13 16:4 17:21 18:12 19:3,4 20:2, 16 21:6 22:9,23 23:24 24:5, 17,23 25:3, 10 26:4,8, 11,18,21,24 27:22,25 28:3 30:14, 18 32:3 33:9 37:9 38:10
Olson
7:25 8:4,5 9:12,16,19 10:15,19 12:2,13,24 13:2,9,19 14:1,4,22 15:1,14,18 16:6,17,21 17:7,16,22 18:1,10 19:6,15 20:9,13,18, 22 21:3,8, 12,22 22:6, 19,20 23:6, 11 24:2,8, 11,12,17,24 25:12,25 26:17 27:6 28:6,9 33:1
one
4:23 12:17 16:11 31:3
opinions
5:10 15:17 22:1
order
13:17
outlet
16:10 18:24
outside
28:11,21
overview
7:14

P

page
7:12,20,23 8:15,22 9:8, 10 10:12 13:23 14:21 15:12 16:3 17:20 19:3, 8,9,10 20:15 21:5,7,20 22:7,18,20, 22,25 23:22 24:3,18,19, 20,21,23,25 25:3,6,24 26:17 27:21 29:8,9,13,14 30:3,6,15, 19,21,22,24 31:2,5,7,10, 13,15,16 32:1,16,23 33:8,22 34:6,14,22 35:4,12,19 36:2,7,25 37:8 38:2,9 39:11
pages
31:11
paragraph
9:13 11:21, 23 14:18 18:6 19:5, 11,21 20:12, 17 21:7,21, 25 22:10 23:2,6,9 25:11,22 26:1,6,7,11, 14,15,16,20, 24 27:2,9, 10,14,20,24 28:3,5,9,13, 17,21,25 29:16 30:5, 9,10,11,13 32:7,17,24 33:10,11,23 34:7,15,23 35:5,13,20 36:8,16 37:1,10,18 38:1,11,19 39:12
paragraphs
9:13,24 10:5,19,25 15:10,25 16:20 22:5 23:5,11,20 29:1,3 30:6 39:3
part
20:1,8
participating
3:2
parties
3:11
patent
4:25 5:2,4 11:9,13 22:11
PDF
24:21
penalty
3:10
percent
28:23
performs
12:20
perjury
3:10
person
3:9

petitioner
3:20
physical
6:9
physically
3:4
place
3:9
please
3:14,22 5:15
31:22
pointing
11:22
portion
18:10 20:6
POSITA
11:13 13:16
27:4,12
position
9:19 10:18
11:4 13:13
14:3,25
17:25 19:15
20:21 21:11
23:14
power
11:6,15,19
12:4,6,10,
17,25 13:3,
14,17,20
16:10,13
17:10 18:14,
24 23:17
29:20
Powermat
3:17
preamble
9:16,20
32:10,12,14
36:9
predictable
29:10
prepare
7:2
prepared
6:1,18
preparing
6:21 7:5
present
3:4
previous
18:25
primary
16:13 17:10
18:15 29:17,
18
prior
7:14 8:8,11
22:15
processor
12:16
provided
8:12,20 9:1,
5
pull
24:10
put
13:2 19:19

Q

question
11:24 18:13,
20 19:25
20:1 31:6
quotient
23:18

R

raise
3:23
read
26:6,11,19,
24 28:3
reason
4:10
receiver
18:15
recently
4:20
recess
31:23
recognize
5:25 6:17
record
3:16 31:22
39:20
refer
5:2 28:9
30:19 31:15
reference
8:5,12,19,20
9:1 22:1,16
24:11,12
25:25 27:7,
16,19 28:19
29:23 30:3
references
22:5
referring
5:4 7:21
18:23 24:19
30:16,20
31:12,16
related
4:23 16:9
25:15
relates
4:24
relation
4:7 7:9 9:16
10:15,18,24
11:3 12:17
13:7 14:10,
17 15:15,25
16:6 17:7,23
18:6,10
19:7,15,20
20:19 21:2,
9,17,22 22:2
24:1 27:7
32:9,12,14,
18,21 33:1,
5,12,19,25
34:4,8,10,
11,16,20,24
35:2,6,8,14,
16,21,24
36:9,13,18,
22 37:2,4,
12,15,19,22
38:3,6,12,
16,20,24
39:4,8,13,16
relied
29:3
relies
13:9
rely
13:6 28:21
36:12,21
37:5,14
38:5,15,23
39:7,15
relying
12:14,24
remember
28:24
remotely
3:6
Reporter
3:1,22 5:23
24:15 30:1
reporting
3:5,14
reports
5:10
respect
10:11 11:7,
8,10,12
20:4,10
33:14
reviews
26:9,22 28:1
Richardson
7:4
right
3:23
room
3:5

S

says
25:23 29:17

scope
28:11,22
screen
6:2
search
8:9,11
secondary
18:15
section
7:14,17
16:16 18:11
22:13
see
6:23,25
7:15,18,19
19:14 28:7,
17 29:2,20
30:14 36:2
sentence
29:17
sentences
12:2
share
6:2
short
31:23
silent
20:9
single
22:15
Sora
3:17
speak
7:6,8
specific
18:13 26:13
27:1,6,15
28:5,14,16,
18
specifically
5:12 13:6,19
25:18
specify
5:15
starting
7:12 19:5,12
20:17 21:20
23:2 29:9
32:23 33:10,
22 34:6,15,
22 35:4,12
38:1
starts
25:1,6 36:3
state
20:12 22:10
23:9
stated
13:18 28:20
stating
3:15
step
28:8
Stephens
3:19,20 6:8,
13 11:1
14:6,12
15:3,5,21
16:24 17:17
19:22 30:23
Stevens
8:18 24:2,7
29:23 30:3,
20 31:2,6,
14,15 32:13,
17,20,25
33:4,12,19
34:3,11,19,
23 35:1,9,
17,24 36:4,
13,22 37:5,
15,23 38:6,
16,24 39:8,
16
Stevens-olson
29:11 32:8
33:24
strike
20:7
structures
17:13,15
submitted
6:23
supply
12:4 16:13
17:10
sure
7:21 10:1,8
swear
3:24
switch
26:13 27:1,
5,8,13,15,17
28:5,13,14,
16
switching
27:11,18
28:18
system
25:6 27:12
systems
25:19

T

take
26:5,19
27:23 28:8
taken
4:7 31:24
talking
5:12 7:19
30:10,11
teaches
12:3,13 13:3
technically
28:11
Technologies
3:18,21
term
19:23
terminology
23:5
testify
4:11
testimony
3:25
theory
9:23 10:23
14:10 19:20
thereof
14:16,20
15:10,25
17:2,5 18:6
19:24 20:3
21:2,17
thing
13:21
think
10:7 30:7
three
4:18 12:1
17:12,14
times
4:16
title
24:25
today
4:12 5:9
top
25:4 26:2
30:21 31:7,
13,17
transcutaneou
s
25:7
transfer
25:8,19
true
11:16
truth
4:1,2
truthfully
4:11
turn
5:18 7:23
8:15,22 9:8
10:12 13:23
14:21 15:12
16:3 17:20
19:3 20:15
21:5 22:7,
18,21,25
23:22 24:3,
18,23 25:24
26:16 27:20
29:4,7,13

30:13 32:1
turning
21:20 32:16
33:8 34:14,
22 35:12,19
36:16 37:8
38:9 39:2,11
two
4:18,19,22

U

U.S.
4:24 5:2
understand
4:6 5:4,7
27:4,13
understanding
31:1
unit
29:17,19,20
unpatentable
22:12
USC
22:13

V

vague
18:12
variation
14:15,20
15:24 17:1,5
18:5 19:24
20:3 21:1
variations
10:4 15:9
21:16
volt
12:4
voltage
11:18,25
12:9,21
13:3,4,5,14,
18,19

W

Wait
7:18
waive
3:12
want
6:2 28:12
way
13:2
witness
3:9 4:3 6:11
26:9,22 28:1
Woods
5:19,21 6:8
7:13 8:16
11:4 15:8
24:13 29:24
32:1 39:24
word
10:5,10,23
11:2 14:15,
19 17:1,4
20:3 27:11
words
10:3 15:8,23
18:4 20:25
21:15
written
25:1 31:19

Y

yeah
6:6

Z

zero
39:24