

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

POWERMAT TECHNOLOGIES LTD.,

Plaintiff,

v.

ANKER INNOVATIONS LTD.,

Defendant.

Case No. 5:23-cv-00052-RWS

PATENT CASE

JURY TRIAL DEMANDED

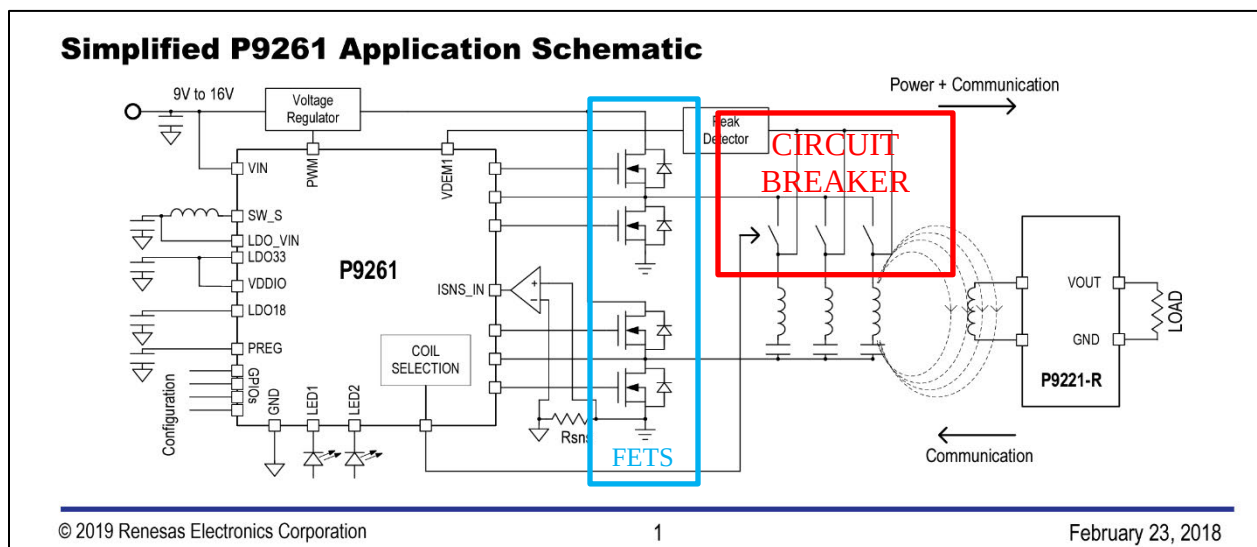
**REBUTTAL EXPERT REPORT OF JAMES DICKENS REGARDING
NON-INFRINGEMENT OF U.S. PATENT NOS.
8,626,461; 8,981,598; 9,006,937; 9,048,696; AND 9,083,204**

194. A FET is a field-effect transistor. FETs have three connection points that are known as the source, gate, and drain, where the flow of current from the source to the drain depends on whether or not a specific voltage is applied to the gate. This is fundamentally different than a circuit-breaker.

195. A circuit-breaker is a device that is designed to prevent damage to an electrical circuit by turning off, or disconnecting, when excessive current flows through the circuit-breaker. Indeed, the '461 Patent itself explains that “If the system has excessive power loss, “a circuit breaker may be used to disconnect the inductive power outlet.” ’461 Patent at 1:20-22.

196. Unlike a transistor, a circuit-breaker disconnects its load from a power source by physically removing the electrical connection between its terminals. Also unlike transistors, circuit-breakers date back to the late 1800s and are commonly known by most homeowners, who have experience turning on and off a circuit-breaker in the electrical panels of their homes.

197. The following figure further demonstrates that a POSITA would consider a circuit breaker to be distinct from a FET. 9260/P9261 Datasheet, ANKER_00010113-115. A circuit breaker is shown on the right, while the FETs on the left are drawn differently:



Id. (annotations added).

[REDACTED]

203. Dr. Williams further states that “My testing confirms that thermal overload test procedure specifically resulted in the power being cut, which underscores my opinion that this claim is infringed.” Ex. C of Williams Opening Rpt. at ¶ 182 (citing Appendices 1-2.) But Dr. Williams’s test simply involved “Send[ing] an EPT Packet with Local Overtemp Reason Code in MAX77950 EV Kit Software” and noting that the A2503 “properly shut down, removing the power from charging the MAX77950.” App. 1 of Ex. C of Williams Opening Rpt.

204. I disagree that sending a test packet and noting that the A2503 is no longer sending power necessarily requires a “circuit-breaker configured to disconnect the primary coil from the power supply.” There are many ways to stop power transfer without using a circuit-breaker to disconnect the primary coil from the power supply. For example, the A2503 could simply deactivate the drivers that drive the Primary Coil. Alternatively, the A2503 could use something other than a circuit-breaker, such as a transistor or a switch, to disconnect the primary coil from the power supply.

205. In fact, my analysis of the materials cited by Dr. Williams shows that the A2503 deactivates the drivers when a thermal overload occurs. Dr. Williams relies on a schematic for the A2503 that shows the [REDACTED] chip (Ex. C of Williams Opening Rpt. at ¶ 182 (citing ANKER_00000615 (A2503 electrical schematic))), and the datasheet for the [REDACTED] chip says the following:

[REDACTED]