

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE EASTERN DISTRICT OF TEXAS

3 TEXARKANA DIVISION

4 POWERMAT TECHNOLOGIES, LTD,)(

5 PLAINTIFF,)(CIVIL ACTION NO.

6)(5:23-CV-52-RWS

7 VS.)(TEXARKANA, TEXAS

8)(

9 ANKER INNOVATIONS, LTD.,)(SEPTEMBER 23, 2025

10 DEFENDANT.)(10:01 A.M.

11 MOTIONS HEARING

12 BEFORE THE HONORABLE ROBERT W. SCHROEDER III

13 UNITED STATES DISTRICT JUDGE

14
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(Proceedings recorded by mechanical stenography, transcript
produced on a CAT system.)

09:53:25 1 COURT SECURITY OFFICER: All rise.

10:01:46 2 THE COURT: Please be seated.

10:01:47 3 Ms. Combs, if you would, call the case for us.

10:01:50 4 COURTROOM DEPUTY: Cause No. 5:23-CV-52, Powermat

10:01:56 5 Technologies Limited versus Anker Innovations.

10:02:03 6 THE COURT: Announcements for the record?

10:02:03 7 MR. TIDWELL: Good morning.

10:02:05 8 THE COURT: Good morning.

10:02:05 9 MR. TIDWELL: Kelly Tidwell on behalf of Powermat

10:02:10 10 Technologies, along with co-counsel, Kfir Levy, Michael

10:02:12 11 Lindinger, Julia Haines, and William Barrow. We announce

10:02:15 12 ready to proceed.

10:02:16 13 THE COURT: Very well.

10:02:17 14 MR. REGER: Good morning, Your Honor.

10:02:20 15 THE COURT: Good morning.

10:02:21 16 MR. REGER: Tom Reger on behalf of Anker. With me

10:02:24 17 is Aaron Pirouznia, Noel Chakkalakal.

10:02:24 18 THE COURT: Hello.

10:02:26 19 MR. REGER: Jennifer Ainsworth.

10:02:26 20 THE COURT: Hello.

10:02:28 21 MR. REGER: And Bryan Cannon, Your Honor. And

10:02:31 22 we're ready to proceed.

10:02:32 23 THE COURT: Very well.

10:02:33 24 Okay. Welcome to everyone. We're here for the

10:02:38 25 dispositive motions hearing. We have allocated four hours

10:02:46 1 total, two hours per side for presentation of argument
10:02:50 2 today. I'll obviously rely on the parties to use their
10:02:57 3 time as you see fit. You have proposed an order for
10:03:04 4 proceeding today, and it certainly looks acceptable to me.

10:03:07 5 So we'll see where we are at the noon hour, but it
10:03:13 6 will probably be necessary for us to take a -- take a break
10:03:17 7 about then.

10:03:18 8 So if the Defendant, Anker, wishes to go forward
10:03:25 9 on its partial motion for summary judgment of
10:03:29 10 non-infringement on the '461, it may do so.

10:03:33 11 MR. REGER: Thank you, Your Honor.

10:03:36 12 Once again, Tom Reger on behalf of Anker.

10:03:40 13 And if we could have our slides, please.

10:03:44 14 Your Honor, may I pass out the slides, please?

10:04:01 15 THE COURT: Yes.

10:04:03 16 MR. REGER: Okay. Your Honor, may I approach?

10:04:16 17 THE COURT: Yes.

10:04:16 18 MR. REGER: Thank you.

10:04:17 19 Your Honor, Anker respectfully moves for partial
10:04:40 20 summary judgment of non-infringement of the '461 patent.

10:04:42 21 Your Honor, the issue before the Court is simple.

10:04:47 22 Is power and current the same concept? We know that

10:04:50 23 legally and scientifically, they are not the same. And

10:04:54 24 because they are not the same, Powermat's infringement

10:04:58 25 allegations, Dr. Williams's infringement opinions fail as a

1 matter of law.

2 We first turn to the claim at issue, and that's
3 Claim 13, which is the independent claim from which 14
4 relies. Claim 13 requires an efficiency monitor that
5 includes an input power monitor that measures input power.

6 Now, we're going to come back to this second
7 piece, but I would like to direct Your Honor to the second
8 part, and that is it's not just measuring power, it's where
9 does that measurement take place?

10 And we will know from Powermat, from what they
11 told the PTAB, that location matters. It's not just any
12 power measurement. You must measure the input power
13 received by the primary coil. So the location is going to
14 matter later on.

15 But the threshold issue, Your Honor, is what is
16 being measured and what constitutes literal infringement
17 and what does not constitute literal infringement.

18 We know from the patent that a power monitor,
19 particularly with respect to the claimed efficiency
20 monitor, is in Claim 5. It is an input power monitor that
21 measures the input power, just like the claim requires.

22 What we also know that's separate from the power
23 monitor, separate from measuring power there is a current
24 monitor. The current monitor monitors the primary current.
25 Again, so we have -- just at the outset in the patent we

10:06:27 1 have a power monitor, and we have a current monitor. They
10:06:30 2 are different in the patent. And, again -- once again,
10:06:34 3 Your Honor, they are different scientifically. They are
10:06:37 4 different concepts. While they are related, they are not
10:06:39 5 the same.

10:06:40 6 Dr. Williams agrees. Again, from a scientific
10:06:43 7 standpoint, this is really not in dispute. You can
10:06:47 8 calculate power using current but not current alone. You
10:06:52 9 must look at something else. And we'll come to that, as
10:06:56 10 well. You must actually look at voltage, as well.

10:07:00 11 Powermat's issue, and respectfully why we are
10:07:07 12 entitled to summary judgment with respect to this patent,
10:07:09 13 is that Powermat only accuses a power monitor. The only
10:07:14 14 time Dr. Williams points to something as the alleged
10:07:17 15 claimed power monitor, he points to a current monitor. And
10:07:20 16 that fails as a matter of law with respect to literal
10:07:24 17 infringement.

10:07:25 18 We see here an example. Claim 13[a] is the input
10:07:28 19 power monitor that measures input power.

10:07:32 20 Now, what does Dr. Williams point to? He points
10:07:34 21 to something called the Current Sense. Now, he says it
10:07:34 22 measures input power, but that's a conclusory statement
10:07:39 23 because his evidence -- what he actually says is it
10:07:42 24 measures current. And he says that over and over again.

10:07:49 25 The only thing Dr. Williams identifies as the

10:07:52 1 alleged power monitor is the Current Sense component.

10:07:58 2 Now, when we look to the Qi standard, and I know,
10:08:01 3 Your Honor, we spent a lot of time talking about the Qi
10:08:04 4 standard earlier in this case, but the Qi standard defines
10:08:07 5 how the products operate. These are wireless power
10:08:12 6 chargers.

10:08:13 7 And so you look at the Qi standard. Dr. Williams
10:08:17 8 relies on the Qi standard for his infringement allegations.
10:08:20 9 And here we see in Claim 93, he says: The Current Sense
10:08:25 10 measures the input power as current.

10:08:27 11 And once again, that fails as a matter of law
10:08:30 12 because current and power are different. And don't take my
10:08:33 13 word for it, Your Honor. We look at the Qi standard. And
10:08:36 14 here we see what the Current Sense component measures. The
10:08:40 15 only thing identified by Dr. Williams as the alleged power
10:08:42 16 monitor is a Current Sense component that measures only
10:08:45 17 current.

10:08:45 18 And, again, we see it over and over again, the Qi
10:08:52 19 standard, that the Current Sense component measures
10:08:56 20 current, not power, not voltage. Current and current
10:09:00 21 alone.

10:09:00 22 In fact, here, we see the control loop that,
10:09:04 23 again, repeatedly talks about measuring the current and the
10:09:08 24 current alone.

10:09:08 25 Now, the Qi standard does have -- for the moment,

1 Your Honor, if I could take a break from the accused
2 devices and the accused standard sections, there is a
3 separate portion of the Qi standard that measures both
4 current and voltage. And from that, you could calculate
5 the power.

6 The problem with Powermat -- for Powermat is that
7 is an unaccused section of the standard because Anker does
8 not implement that section. So what we have is we have a
9 component that measures current and current alone, and then
10 we have a separate component that could measure current and
11 voltage that's not in Anker's products.

12 And we know that measuring something and
13 determining something are two different concepts. We know
14 that from Powermat's briefing, and we know that from
15 Dr. Williams from his expert report.

16 So when you're measuring power, you're supposed to
17 find something in the products that measures power. And at
18 the end of the day, Your Honor, at no point does
19 Dr. Williams or Powermat identify a power monitor in the
20 accused products that measure input power received by the
21 primary coil.

22 So for that, Your Honor, we ask for no
23 infringement as a matter of law.

24 Now, let's talk about what Powermat points to.
25 Because they know that the Qi standard measures only

1 current and that current and power are different, and so
2 Current Sense alone cannot measure -- cannot determine
3 power, they start pointing to earlier things from that Qi
4 standard. So, for example, at the top, they point to input
5 power.

6 Now, at no point do they identify anything that
7 measures that input power, nothing that they could point to
8 that would maybe satisfy part of the claim requirements of
9 having a power monitor that measures the input power. They
10 don't do that.

11 But even if they did, the problem is -- again, the
12 second part of the claim requirement was measuring the
13 power at the primary coil. And so the input power at the
14 top, Your Honor, goes through a series of other components,
15 such as an inverter where there is power loss. So even
16 if -- and they don't -- but even if Powermat said there's
17 something that measures that input power at the top, that
18 input power at the top is not what is processed by the
19 primary coil because there is power loss, and Powermat has
20 to admit that because Dr. Williams admits that.

21 Here we have Dr. Williams admitting that the input
22 power coming into the device is going to lose power. It is
23 not the same as what's going to be processed by that
24 primary coil.

25 And, again, Your Honor, I hinted at this early on,

10:11:58 1 but in the -- at the PTAB in an IPR, Powermat over and over
10:12:04 2 again tried to distinguish the prior art by saying that the
10:12:08 3 location matters. They say that measuring the input power
10:12:10 4 with respect to the prior art is not the same, and it's not
10:12:14 5 the same because the measurement is different. So if you
10:12:16 6 measure the input power at the top, that's not the same as
10:12:19 7 measuring the power at the primary coil. That is how they
10:12:23 8 attempted to distinguish the prior art.

10:12:25 9 We see it here again. Olson describes the voltage
10:12:29 10 is not measured at the primary coil, but it's measured
10:12:32 11 somewhere else. And they say it again, that any
10:12:35 12 calculation of power based on incorrect measurements is not
10:12:38 13 a measurement of input power received by the primary coil.

10:12:42 14 So what we know is that the only thing that is --
10:12:50 15 can meet the claim limitations is Powermat identifying
10:12:53 16 something that can measure the power, not -- not current,
10:12:59 17 measure the power at the primary coil, and at no point did
10:13:02 18 they do so.

10:13:03 19 They have -- they do point to something called
10:13:07 20 FOD, foreign object detection. But, again, that foreign
10:13:10 21 object detection, not only is it optional, it does not
10:13:13 22 measure all the power at the various components. We do not
10:13:17 23 know the actual current and voltage or actual power
10:13:21 24 received by the primary coil as required.

10:13:22 25 They point to EPP functionality, which is only

1 used by a subset of the accused products. Again, this is
2 optional functionality. And at no point does Dr. Williams
3 say that this EPP functionality is actually incorporated
4 into the Anker products. And bear in mind, Dr. Williams
5 has -- has source code, technical documents, and he does
6 not identify anywhere that this optional functionality is
7 included in Anker's products.

8 Now, as we went through the briefing, we made all
9 of these points in our -- in our opening brief and then we
10 addressed their responses in our reply brief. And Anker
11 came back with something new. They spent a lot of time
12 talking about undisclosed infringement theories, and I say
13 it's undisclosed because what they want to focus on in
14 their sur-reply is they talk about a known resistor, which
15 kind -- which kind of comes out of nowhere. And I say it
16 comes out of nowhere because I personally searched
17 Dr. Williams's report. He has an 830-page report, Your
18 Honor, and the word "resistor" came up once in 830 pages.

19 So everything in their sur-reply saying that,
20 well, maybe you can have a resistor that actually
21 determines the power, Dr. Williams never talks about that,
22 not once. Not only is it inaccurate, it is attorney
23 argument, unsupported by evidence, unsupported by their
24 expert.

25 So at the end of the day, Your Honor, we

1 respectfully suggest that Powermat identified a current
2 monitor that measures only current is insufficient as a
3 matter of law to show a power monitor that measures power
4 because power and current are different.

5 Now, I would like to briefly address the doctrine
6 of equivalents argument, if I may, Your Honor.

7 This is the extent of Dr. Williams's doctrine of
8 equivalents opinion. It's three paragraphs. There's two
9 introduction, 189 and 190, but then from 191, 192, and 193,
10 this is it. This is his doctrine of equivalents theory for
11 the '461.

12 Now, there are some cites to the patent where he
13 describes -- where he references the patent for explaining
14 why there's a particular function, why there's a particular
15 way, and why there's a particular result. But it's
16 important, Your Honor, that this doctrine of equivalents
17 opinion from Dr. Williams has no evidence cites. At no
18 point does he say anything about the Anker products. He
19 doesn't point to the Qi standard, doesn't point to source
20 code, doesn't point to technical documents. At no point
21 does he say how Anker supposedly meets the doctrine of
22 equivalents theory. So that's insufficient as a matter of
23 law. You cannot just have conclusory statements with
24 respect to DOE.

25 THE COURT: Can I ask you what your most analogous

10:16:21 1 case for a Court that granted summary judgment on doctrine
10:16:25 2 of equivalents?

10:16:26 3 MR. REGER: Your Honor, let me take a look at
10:16:37 4 that. I don't have one at the top of my head.

10:16:40 5 THE COURT: All right. That's fine. That's fine.
10:16:41 6 Can I go back to the first issue? Are you finished with
10:16:43 7 this issue?

10:16:44 8 MR. REGER: The only thing I was going to point
10:16:46 9 to, Your Honor, is his doctrine of -- when he points to the
10:16:49 10 patent and what's -- what he believes suffices as an
10:16:52 11 equivalence theory is he points to this equation that power
10:16:56 12 equals voltage times current, which, again, it's a
10:16:59 13 scientific principle. We're familiar with that.

10:17:01 14 At no point does he ever identify anything that
10:17:06 15 actually shows the -- where the voltage is measured. And I
10:17:16 16 will say that I do want to answer your question. I'd like
10:17:19 17 to go back and look. But here is a quote that is a pretty
10:17:22 18 good quote, that the failure to explicitly identify the
10:17:25 19 alleged equivalent is fatal to their doctrine of
10:17:28 20 equivalents theory. So this would be a good start, Your
10:17:30 21 Honor.

10:17:30 22 THE COURT: All right. On the first issue --

10:17:33 23 MR. REGER: Yes, Your Honor.

10:17:34 24 THE COURT: -- why can't the input power received
10:17:37 25 by the primary coil from the power supply be measured at

10:17:42 1 any point between the power supply and the primary coil?
10:17:47 2 Why does it need to be measured immediately before the
10:17:50 3 primary coil?

10:17:51 4 MR. REGER: Well, the claim requirement -- there's
10:17:56 5 two answers to that. One is what the claim requires. The
10:17:59 6 claim requires that you measure the power received by the
10:18:02 7 primary coil.

10:18:03 8 So that's really -- if I could go back to Slide --
10:18:09 9 what is it 4, I believe.

10:18:11 10 This is the claim language, Your Honor. So the
10:18:13 11 claim actually requires that you measure the input power
10:18:16 12 received by the primary coil. It's not received by the
10:18:18 13 power outlet. It's not received by anything else. The
10:18:21 14 claim requires that you measure the power received by the
10:18:25 15 primary coil. And as I mentioned earlier, Your Honor,
10:18:28 16 Powermat agrees with us before the PTAB. They said the
10:18:31 17 location matters, that you actually have to measure it at
10:18:34 18 the primary coil so that that is representations Powermat
10:18:37 19 made to the PTAB.

10:18:38 20 And it matters as a practical matter, as well,
10:18:42 21 because as we know, Dr. Williams agreed that there is power
10:18:50 22 loss, that as the power is received by the product itself,
10:18:54 23 as it moves -- as the power moves through the various
10:18:57 24 components, there is power loss. And so measuring it at
10:19:00 25 the very beginning of the process is not the same as

10:19:04 1 measuring it at the primary coil because they're going to
10:19:06 2 be different. You're going to be losing power as it moves
10:19:09 3 through the components. And Dr. Williams acknowledges that
10:19:11 4 here in his -- in his deposition testimony.

10:19:13 5 And we also know that Powermat was pointing to
10:19:17 6 this, that there's power loss at the inverter. So if you
10:19:21 7 measure the input power at the top, there is going to be
10:19:24 8 power loss by the inverter. So that input power is
10:19:26 9 different from the power received by the primary coil. And
10:19:28 10 the claim language requires that you measure the power
10:19:31 11 received by the primary coil.

10:19:35 12 THE COURT: Thank you.

10:19:36 13 MR. REGER: Thank you, Your Honor. Any other
10:19:37 14 questions?

10:19:38 15 THE COURT: No, that's all.

10:19:39 16 MR. REGER: All right. Thank you, Your Honor.

10:19:40 17 THE COURT: Thank you.

10:19:42 18 MR. LINDINGER: Good morning, Your Honor. May I
10:19:44 19 approach?

10:19:44 20 THE COURT: Yes.

10:20:33 21 MR. LINDINGER: Good morning, Your Honor. Michael
10:20:34 22 Lindinger on behalf of Powermat.

10:20:35 23 You heard Anker's attorney say that you must use
10:20:38 24 voltage for the power calculation, but that's wrong.

10:20:41 25 The basis of Anker's motion is a wrongful

1 assertion that the claims require a calculation of power
2 using a product of voltage and current measurements.

3 And while power may be calculated as a product of
4 voltage and current measurements, the claims are not
5 directed to a calculation of power or a calculation of
6 power in a specific way. The claims require a power
7 monitor.

8 And contrary to Anker's arguments, Powermat has
9 not accused only a current monitor. Rather, as set forth
10 in Dr. Williams's report, the relevant portions were
11 attached in full as Exhibits A and B to Powermat's
12 opposition -- this is Docket 102-2 and 102-3. Dr. Williams
13 explained that in the reference design, such as Alla shown
14 on Slide 3 here, the inverter converts a DC input to an AC
15 waveform that drives the primary coils through a resonant
16 capacitor to induce a voltage across a coupled secondary
17 coil. The Current Sense block measures the input power as
18 current caused by the AC waveform in the primary coil.

19 In other words, Your Honor, as shown in the
20 picture on the screen, the input power comes into the power
21 conversion unit, the inverter conducts certain operations,
22 and the Current Sense block is the last component receiving
23 the information, including input power from the preceding
24 steps before passing that information on to the control and
25 communication unit.

10:22:38 1 That reference design -- that the reference
10:22:41 2 designs employed by the accused '461 products do not
10:22:45 3 explicitly reference a voltage measurement, that's not
10:22:48 4 relevant because voltage measurement is not required by the
10:22:53 5 claim language, and any attempt to read in such a
10:22:55 6 requirement by Anker is wrong.

10:22:57 7 Now, in its reply brief, and you heard Anker's
10:23:03 8 attorney talk about this a bit, they recite Ohm's law, that
10:23:11 9 power equals voltage times current. And that's at their
10:23:15 10 reply at 109 -- Docket 109 at Page 1.

10:23:18 11 But as we stated in our sur-reply, power can also
10:23:21 12 be expressed as a function of current and resistance as
10:23:22 13 follows: P equals I squared times R .

10:23:27 14 Now, that's not a new infringement theory. This
10:23:29 15 is just responding to what Anker was trying to do in their
10:23:33 16 briefing as far as reading in voltage calculation --
10:23:38 17 voltage measurement into the claims. And, again, with a
10:23:43 18 known resistor with known resistance information, one can
10:23:47 19 measure the voltage across the resistor or current flowing
10:23:48 20 into the resistor to determine the power and thus power
10:23:52 21 loss.

10:23:52 22 That's exactly what the non-standard technical
10:23:55 23 documentation shows. This is what Anker wants to ignore.
10:23:58 24 This is what they want to hand-wave away.

10:24:01 25 THE COURT: What's the basis for Dr. Williams's

10:24:03 1 opinion that the Current Sense measures power directly?

10:24:07 2 MR. LINDINGER: If we can go back to the prior
10:24:11 3 slide, Bill.

10:24:12 4 This is from his report, and this is kind of
10:24:14 5 summarizing his opinions where he walks through -- I'm
10:24:18 6 sorry, this is -- this is the -- the image on the right on
10:24:22 7 Slide 3 is from the Qi standard, but we're citing in the
10:24:29 8 portion of the citation his expert report at those pages.
10:24:32 9 This is where he's walking through where the input power is
10:24:36 10 coming through the inverter to the primary coil through the
10:24:40 11 Current Sense.

10:24:40 12 Now, you heard Anker's attorney talk about, well,
10:24:43 13 there might be some power loss because it's hitting the
10:24:47 14 inverter first. But even if there's power loss -- a little
10:24:51 15 bit of power loss at the inverter, and Dr. Williams talks
10:24:54 16 about that, that's -- there's still a power monitor. The
10:24:59 17 fact that there might be a little bit of power loss at the
10:25:03 18 inverter, there's still power received by the primary coil
10:25:04 19 measured at the primary coil.

10:25:07 20 THE COURT: I may not have understood your answer.
10:25:10 21 Can you explain again what the basis for his opinion that
10:25:15 22 the Current Sense measures power directly?

10:25:18 23 MR. LINDINGER: Exactly, Your Honor. I mean, when
10:25:22 24 it's direct -- I mean, it's coming through the inverter
10:25:26 25 first. I mean, there's no claim requirement, I guess, that

10:25:30 1 it is -- there's nothing before it. It's the -- the claim
10:25:36 2 language talks about input power received by the primary
10:25:40 3 coil from the power supply. That input power is ultimately
10:25:44 4 received by the primary coil through the inverter first.
10:25:47 5 And even if there's a little bit of power loss there, Anker
10:25:51 6 has not shown that it is contrary to the claim language
10:25:56 7 that the claim -- that the accused products do not meet the
10:25:59 8 claim language by pointing to the Qi standard or, again,
10:26:02 9 the non-technical documents which we -- Dr. Williams goes
10:26:05 10 over, and I have some in my slides here.

10:26:07 11 THE COURT: So why does Dr. Williams know that
10:26:10 12 power is measured at all?

10:26:12 13 MR. LINDINGER: Because, one, he looked to the Qi
10:26:15 14 standard, he looked to the non -- the non-standard
10:26:18 15 technical documents, such as the data sheets that we cite
10:26:21 16 to in our briefing, he cites to in his report, and then I
10:26:25 17 have in the slide deck here, as well as his product
10:26:28 18 testing.

10:26:32 19 So it's not that he only relied on the Qi standard
10:26:35 20 and called it a day. That could be enough because we
10:26:38 21 assert that the -- all of the asserted patents are standard
10:26:46 22 essential for the Qi standard. But we went an extra step
10:26:49 23 further and looked at the non-standard technical documents
10:26:52 24 and product testing to further illustrate why infringement
10:26:54 25 is met for each of the claim limitations here, Your Honor.

10:26:57 1 Bill, if you can go to, yeah, Slide 5.

10:27:04 2 And at this point, Your Honor, I'd like to seal
10:27:06 3 the courtroom.

10:27:07 4 THE COURT: Okay. The courtroom will need to be
10:27:11 5 sealed at this time.

10:27:12 6 (Courtroom sealed.)

10:27:12 7 (Sealed Portion No. 1 saved in separate sealed
10:33:48 8 transcript.)

10:33:48 9 (Courtroom unsealed.)

10:33:49 10 MR. LINDINGER: You can go to the next slide,
10:33:52 11 Bill, please.

10:33:53 12 And so, again, this is an image. This is kind of
10:33:56 13 some of the product testing he did. The color picture on
10:33:58 14 the right-hand side is of the foreign object detection.
10:34:01 15 This is what I was talking about, Your Honor. This is the
10:34:03 16 Anker device, the black hockey puck-shaped device. The red
10:34:09 17 box -- the annotated red box is showing a piece of foil
10:34:13 18 that he put in between the receiver device that he was able
10:34:17 19 to change the various parameters and input with the
10:34:21 20 software that he used.

10:34:22 21 So, again, this is all to support his opinions
10:34:25 22 that this element is met.

10:34:29 23 THE COURT: The schematic that you showed just a
10:34:31 24 moment ago, is that applicable to other products other than
10:34:35 25 the A2503?

10:34:38 1 MR. LINDINGER: I mean, the opinions are
10:34:42 2 applicable. You know, he looked at other schematics in the
10:34:44 3 context of a larger chart in his -- he had basically a main
10:34:52 4 body report, and then he had appendices for each of the
10:34:55 5 patents.

10:34:55 6 In the main body report he looked at and analyzed
10:34:58 7 the different data sheets, cited to and analyzed the
10:35:01 8 schematics. Those schematics, the vast majority were
10:35:06 9 produced for each of the accused products to support his
10:35:08 10 opinions that the claim elements were met.

10:35:12 11 If you can go to the next slide, Bill.

10:35:15 12 And so you heard Anker's attorney talk about some
10:35:18 13 of his deposition testimony. Again -- and the positions
10:35:24 14 that Powermat has taken in the IPR. This is the Olson
10:35:27 15 reference. This is the reference that was talked about in
10:35:30 16 the briefing that I believe came up in the IPR that is kind
10:35:33 17 of the relevant prior art reference.

10:35:36 18 Mentioned in the briefing here, they highlight
10:35:42 19 Dr. Williams's testimony as allegedly supportive of its
10:35:45 20 motion, but it is not. His deposition testimony was made
10:35:48 21 specifically in the context of this prior art reference,
10:35:50 22 this Olson reference. And that was deficient in disclosing
10:35:53 23 the claimed input power monitor. And this is explained
10:35:57 24 more fully in Powermat's opposition on Page 8 and its
10:36:03 25 sur-reply on Page 7 to 8.

10:36:04 1 But in sum, the surrounding testimony reflects
10:36:08 2 Dr. Williams was making specific remarks in relation to
10:36:11 3 Olson, not writ large in -- in the universe here.

10:36:16 4 For example, he agrees with the characterization
10:36:22 5 that his disagreement with Olson has to do with the fact
10:36:26 6 that it's measuring current at the wrong spot and not
10:36:29 7 necessarily that it's measuring current instead of power.
10:36:31 8 And as we talked about, measuring current can be sufficient
10:36:35 9 if it's through a known resistor, the P equals I squared
10:36:40 10 times R .

10:36:41 11 THE COURT: So where does Olson measure current?

10:36:43 12 MR. LINDINGER: It measures it at essentially the
10:36:46 13 wrong place. I don't have that figure up here, Your Honor,
10:36:51 14 but that was the distinction that I believe was made at the
10:36:54 15 IPR as far as measuring current at the wrong place.

10:37:07 16 THE COURT: Do you --

10:37:08 17 MR. LINDINGER: I'm sorry.

10:37:10 18 THE COURT: Do you agree with the Defendant that
10:37:12 19 in order to literally infringe Element 13[a], the claimed
10:37:17 20 input power monitor has to measure the power that's
10:37:20 21 supplied to the primary coil?

10:37:21 22 MR. LINDINGER: Yes, Your Honor, with the added
10:37:28 23 comment that, again, we believe we have shown that even
10:37:31 24 though in the Qi standard reference designs, there's the
10:37:36 25 inverter before it. Again, even if there is a slight power

10:37:40 1 loss through the inverter, the received power is still
10:37:43 2 going to the primary coil. There's no -- there's no claim
10:37:49 3 language that requires there be some direct measurement or
10:37:52 4 there can be nothing in between there.

10:37:54 5 THE COURT: Okay. So there can't be any type of
10:38:03 6 intervening resistor or inverter between the locus of the
10:38:08 7 input power monitor's measurement and the primary coil?

10:38:11 8 MR. LINDINGER: There's -- there's no -- there's
10:38:14 9 no specific claim requirement that precludes the reference
10:38:17 10 design that we've highlighted as shown on Slide 3 of our
10:38:24 11 slide deck.

10:38:24 12 And my colleague noted for me just as a reminder,
10:38:28 13 Olson -- the Olson prior art reference shown here on Slide
10:38:31 14 19, they conduct the measurement not at the primary coil --
10:38:37 15 I'm sorry, it doesn't conduct the measurement at the
10:38:40 16 primary coil at all. It just conducts it in a wholly
10:38:43 17 different configuration.

10:38:45 18 And just -- just briefly, Your Honor, to touch on
10:38:48 19 the doctrine of equivalents argument that Anker's attorney
10:38:52 20 made at the end of his presentation -- if you can go to the
10:38:55 21 next slide, please, Bill.

10:38:57 22 And, again, Anker's doctrine of equivalent
10:38:59 23 argument is, again, built on the incorrect premise that
10:39:03 24 Powermat's DOE theory relies on the relationship between
10:39:06 25 power, current, and voltage. Voltage is not required here.

10:39:14 1 Again, Anker is trying to read in a requirement that
10:39:17 2 Powermat must somehow show a voltage measurement or
10:39:21 3 measures power in a specific way, including a voltage
10:39:23 4 calculation or voltage determination.

10:39:26 5 And the claims require no such thing. And, again,
10:39:29 6 we cited this in our brief, and so -- so for the same
10:39:32 7 reasons for the literal infringement and why that argument
10:39:36 8 fails, this is a -- this is a heavily factual dispute. We
10:39:42 9 cited on our opposition on Pages 11 to 12, the Leggett &
10:39:46 10 Platt, the Vehicular Technologies, and The Charles Machine
10:39:49 11 Works. Each of those Federal Circuit cases highlight the
10:39:52 12 intense factual disputes that make DOE arguments
10:40:00 13 inappropriate, typically for summary judgment here.

10:40:01 14 And just to be clear, Dr. Williams conducted an
10:40:04 15 appropriate and fulsome function-way-result analysis. This
10:40:07 16 is highlighted in our opposition with the citations on
10:40:12 17 Page 20. And for those reasons, Your Honor, we believe
10:40:16 18 that Anker's motion for summary judgment for the '461
10:40:19 19 patent should be denied.

10:40:20 20 THE COURT: Thank you.

10:40:33 21 MR. REGER: May it please the Court. Thank you,
10:40:38 22 Your Honor.

10:40:38 23 Your Honor, there's a few things that we need to
10:40:41 24 unpack from what we just heard from Powermat's
10:40:44 25 presentation.