

2022-

**United States Court of Appeals
for the Federal Circuit**

In Re

CREEKVIEW IP LLC,

Petitioner.

*On Petition for Writ of Mandamus to the United States District Court for the
District of Delaware, Case Nos. 22-cv-0426-CFC, 22-cv-0427-CFC,
Honorable Colm F. Connolly, Judge*

PETITION FOR A WRIT OF MANDAMUS

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November 30, 2022

CERTIFICATE OF INTEREST

Pursuant to Federal Circuit Rule 47.4, Counsel for the Petitioner Creekview IP LLC (“Creekview”) certifies the following:

1. The full name of every party or *amicus* represented by me is:
Petitioner Creekview IP LLC
2. The name of the real party in interest represented by me is:
Not applicable.
3. All parent corporations and any publicly held companies that own 10% or more of the stock of the party or *amicus* represented by me are:
None
4. The names of all law firms and the partners or associates that appeared for the party or *amicus* now represented by me in the trial court or agency or are expected to appear in this court (and who have not or will not enter an appearance in this case) are:
David R. Bennett, Direction IP Law
Jimmy Chong, Chong Law Firm
5. The title and number of any case known to counsel to be pending in this or any other court or agency that will directly affect or be directly affected by this court’s decision in the pending appeal:

In re: Nimitz Technologies LLC	2023-103 (Fed.Cir.)
Nimitz Technologies LLC v. CNET Media, Inc.	1:21-cv-1247-CFC (D.Del.)
Nimitz Technologies LLC v. BuzzFeed, Inc.	1:21-cv-1362-CFC (D.Del.)
Nimitz Technologies LLC v. Imagine Learning, Inc.	1:21-cv-1855-CFC (D.Del.)
Nimitz Technologies LLC v. Bloomberg L.P.	1:22-cv-0413-CFC (D.Del.)
Backertop Licensing LLC v. August Home, Inc.	1:22-cv-0573-CFC (D.Del.)
Backertop Licensing LLC v. Canary Connect, Inc	1:22-cv-0572-CFC (D.Del.)
Lamplight Licensing LLC v ABB, Inc.,	1:22-cv-0418-CFC (D.Del.)

Lamplight Licensing LLC v Ingam Micro, Inc.,	1:22-cv-1017-CFC (D.Del.)
Mellaconic IP, LLC v. Timeclock Plus, LLC	1:22-cv-0244-CFC (D.Del.)
Mellaconic IP, LLC v. Deputy, Inc.	1:22-cv-0541-CFC (D.Del.)
Swirlate IP LLC v. Quantela, Inc.	1:22-cv-0235-CFC (D.Del.)
Swirlate IP LLC v. Lantronix, Inc.	1:22-cv-0249-CFC (D.Del.)
Waverly Licensing LLC v. AT&T Mobility LLC	1:22-cv-0420-CFC (D.Del.)
Waverly Licensing LLC v. Granite River Labs Inc.	1:22-cv-0422-CFC (D.Del.)

6. Provide any information required under Fed. R. App. P. 26.1(b) (organizational victims in criminal cases) and 26.1(c) (bankruptcy case debtors and trustees). Fed.Cir. R. 47.4(a)(6).

None.

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INTRODUCTION

Petitioner asks the Court to review and reverse the attached *sua sponte* Memorandum Order ordering an evidentiary hearing in the cases on December 6, 2022 (“Hearing Order”). (Appx001-002). The district court has no Article III jurisdiction to continue the *sua sponte* Hearing Order because the cases have been voluntarily dismissed by the parties, and the district court has not articulated any recognized collateral issues that could support the hearings after the dismissal of the cases. Even if the district court had Article III jurisdiction to continue the hearings, the continuation constitutes an abuse of discretion. This petition challenges the same standing order and investigation as the co-pending petition for writ of mandamus in *In re Nimitz Techs. LLC*, Appeal No. 2023-103, (Fed.Cir. 2022) (“*Nimitz*”), with the addition that this petition involves cases that have been dismissed and thus raise Article III jurisdictional issues, and the district court is also investigating disclosures for a second standing order.

The Hearing Order relates to two new standing orders entered by the district court after these cases were filed. The first standing order expands the requirements of Fed.R.Civ.P. Rule 7.1 to require certain types of entities to identify every person “up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.” Although the order does not apply to Petitioner because Petitioner is not one of the enumerated entities

required to provide the disclosure, Petitioner filed a disclosure identifying its sole individual owner and managing member.

The second standing order requires all parties to disclose details on any third party that provides non-recourse funding for the case. Petitioner has no third-party non-recourse funding and therefore no disclosure was required. Petitioner filed a Declaration stating that Petitioner complied with the two standing orders and further stating that Petitioner does not receive any third-party non-recourse funding.

Despite the disclosure and declaration, the district court entered the *sua sponte* Hearing Order requiring Petitioner's managing member and its lead attorney to fly to Delaware for interrogation by the district court on December 6, 2022. The sole basis for the hearing is the district court's unexplained "concerns about the accuracy" of Petitioner's disclosures responsive to the two standing orders. The district court has not articulated any reason for the "concerns" and there is no evidence in the record (or otherwise) to dispute the accuracy of Petitioner's disclosures.

There is no Article III jurisdiction of the district court to continue the Hearing Order because both cases have been dismissed, one through timely voluntary dismissal and the other pursuant to stipulation signed by both parties. The district court's vague "concerns" without any factual support fail to provide any basis for maintaining ancillary jurisdiction after the dismissal.

Petitioner has sought relief in the district court by requesting guidance from the district court regarding what information is being sought and what raised the district court's "concerns" regarding Petitioner's disclosures. The district court has not responded.

Petitioner filed a motion to stay stating that the district court lacks jurisdiction and also that the hearing should be stayed because of the petition for writ of mandamus in *Nimitz*, which addresses one of the two standing orders and the same district court investigation at issue here.¹ Although this Court has stayed the investigations in the *Nimitz* cases, the district court has not responded to Petitioner's motion to stay.

Mandamus is appropriate because enforcing the *sua sponte* Hearing Order is improperly maintaining ancillary jurisdiction without articulating any recognized collateral issues that could support proceeding with the hearing after the dismissal of the case. "[W]hen a court has no judicial power to do what it purports to do -- when its action is not mere error but usurpation of power -- the situation falls precisely within the allowable use" of a writ. *De Beers Consol. Mines, Ltd. v. United States*, 325 U.S. 212, 217 (1945). Similarly, addressing the issue of whether the

¹ Petitioner's motion to stay also noted that failing to stay the cases would result in Petitioner having to file this parallel petition for mandamus. (Appx183-184).

district court is “granted [the power] or forbidden” the power to enforce its Hearing Order “presents an opportunity for mandamus review to fulfill its ‘vital corrective and didactic function.’” *United States v. Christian*, 660 F.2d 892, 897 (3rd Cir. 1981) (quoting *Will v. United States*, 389 U.S. 90, 107 (1967)).

Even if the district court can articulate an appropriate collateral issue to maintain jurisdiction, the district court’s two standing orders are irrelevant to any issue in the cases and are not supported by any statute or rule. As shown by the district court’s hearings in the *Nimitz* cases and other cases, the district court’s interest is in the “real party in interest.” However, both the Patent Act, the Federal Rules of Civil Procedure, and this Court’s precedent reject the court’s consideration of such facts. The improper standing orders provide grounds for granting a writ because mandamus can “used as a means of policing compliance with the procedural rules... by using [the appellate court] to review orders that are part of a general practice adopted by the district court which is outside the scope of the rules.” *U.S. v. Christian*, 660 F.2d at 896 (quotation marks and internal citation removed).

As these cases have been dismissed so that there will be no final judgement to appeal, mandamus would not result in piecemeal appeals because there are “no ongoing action[s] that review would disrupt.” *Id.* at 897.

RELIEF SOUGHT

Petitioner respectfully requests that the Court issue a writ of mandamus reversing the Memorandum Order and ending the judicial inquisition of Petitioner.

ISSUES PRESENTED

The petition raises the following issues:

1. Whether the district court lacks Article III jurisdiction to enforce its Hearing Order investigating Petitioner's compliance with standing orders when the cases have been dismissed and there is no evidence refuting the accuracy of Petitioner's disclosures or Petitioner's compliance with the standing orders?
2. Did the district court abuse its discretion in entering its Standing Order Regarding Third-Party Litigation Funding Arrangements and Standing Order Regarding Disclosures Statements Required by Federal Rule of Civil Procedure 7.1 because the information sought by the standing orders is not relevant to any issue that the district court may consider?
3. Do the district court's standing orders and Hearing Order contradict the Patent Act and the Rules of Civil Procedure by seeking to identify a "real party in interest" that Congress has deemed irrelevant?

FACTUAL BACKGROUND AND PROCEDURAL HISTORY

A. Creekview Was Owner of a Patent and Sued Defendants

The Petitioner is Creekview IP LLC (“Creekview”). Creekview filed the two cases that form the caption of the Memorandum Order. Creekview’s complaint against Jabra Corporation (“Jabra”) is Appx013-088 and Creekview’s complaint against Skullcandy Inc. (“Skullcandy”) is Appx089-168. Both complaints allege infringement of U.S. Patent No. 9,608,472.

Both complaints affirm that Petitioner is the named assignee of the ‘472 patent with the right to enforce the patent. (Appx14 at ¶¶8; Appx90 at ¶¶8). That Petitioner is the lawful assignee of the patents-in-suit is reflected in the public records of the United States Patent and Trademark Office as reflected in Appx187-189 of which the Court can take judicial notice.

B. The District Court’s Standing Order and Creekview’s Responses

On April 19, 2022, the district court issued two standing orders. The “Standing Order Regarding Third-Party Litigation Funding Arrangements” requires that parties disclose all

arrangements to receive from a person or entity that is not a party (a “Third-Party Funder”) funding for some or all of the party’s attorney fees and/or expenses to litigate this action on a non-recourse basis

(Appx004-005).²

The “Standing Order Regarding Disclosure Statement Required by Federal Rule of Civil Procedure 7.1” requires that all “nongovernmental joint venture, limited liability corporation, partnership, or limited liability partnership” must disclose:

“the name of every owner, member, and partner of the party, proceeding up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.

(Appx003).

Although Creekview is a limited liability *company* (not corporation) that is not required to submit a disclosure in response to the standing order on ownership,

² The ordinary distinction between “recourse basis” and “non-recourse basis” is reflected in, for example, publications of the United States Internal Revenue Service:

There are two types of debts: recourse and nonrecourse. A recourse debt holds the borrower personally liable. All other debt is considered nonrecourse.

(https://apps.irs.gov/app/vita/content/36/36_02_020.jsp). See also *Bennett v. Donovan*, 703 F.3d 582, 585 (D.C. Cir. 2013) (“Reverse mortgages are generally non-recourse loans, meaning that if a borrower fails to repay the loan when due, and if the sale of the home is insufficient to cover the balance, then the lender has no recourse to any of the borrower's other assets”); *First Indep. Bank of Nev. v. Mohave State Bank*, 2010 U.S. Dist. LEXIS 34517 at *6 (D. Ariz. 2010) (“A non-recourse loan is a ‘secured loan that allows the lender to attach only the collateral, not the borrower's personal assets, if the loan is not repaid’”) (quoting *Black's Law Dictionary* 1020-21 (9th ed. 2009)).

Creekview submitted a disclosure statement stating that the sole owner and managing member is Jacob LaPray. (Appx169-170). Creekview did not receive any non-recourse funding and therefore did not submit a statement regarding non-recourse funding. (*E.g.*, Appx179-180).

Defendant Skullcandy did not submit a statement in response to the standing order on non-recourse funding, but submitted a disclosure in response to the standing order on ownership, though such disclosure did not appear to disclose the “name of every owner, member, and partner of the party, proceeding up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.” (Appx292). Defendant Jabra did not answer the complaint and did not submit a disclosure in response to the district court’s standing orders on ownership or non-recourse funding.

C. The District Court *Sua Sponte* Begins its Judicial Investigation

On September 12, 2022, the district court *sua sponte* entered a Memorandum Order ordering Petitioner’s managing member, Jacob LaPray, to fly from his home in Texas to testify in Wilmington, Delaware, at an evidentiary hearing directed “to determine[ing] whether the amended corporate disclosure statements are accurate and whether Plaintiff has complied with the Court's standing order regarding third-party litigation funding.” (Appx001-002). The district court did not disclose any

evidence or basis for stating that Petitioner did not comply with the standing orders. (*Id.*). The district court directed no such order to either defendant.

Petitioner filed a letter with the district court requesting that the district court provide guidance regarding “any further documents or evidence it seeks to obtain in the scheduled evidentiary hearing so [Petitioner] may be fully responsive and ensure that the requested information is available” to the district court. (Appx177-178). Petitioner further reiterated that it did not receive any non-recourse funding. (*Id.*). The district court has not responded.

Creekview filed a timely Notice of Voluntary Dismissal With Prejudice in the Jabra case on October 6, 2022 to dismiss the case in its entirety. (Appx171-172). Creekview and Skullcandy signed a Joint Stipulation To Dismiss, which was filed on September 28, 2022 to dismiss the Skullcandy case in its entirety. (Appx175-176). The district court has not acknowledged that the cases have been dismissed.

D. The District Court Has Not Ruled on Petitioner’s Motion to Stay Pending the Mandamus Petition in *Nimitz* or Pending Disclosure by the District Court of Why the District Court Has Concerns Regarding the Petitioners Disclosures

After the Court agreed to hear the *Nimitz* petition addressing one of the same standing orders, Petitioner filed a motion to stay with the district court. (Appx181-186). The motion requested that the district court stay the hearing on three bases. First, Petitioner requested that the district court stay the Hearing Order and hearing pending this Court’s ruling on the petition in *Nimitz*. (Appx181-184). A stay will

not impact either case because dismissals have been filed in both cases, so the cases are dismissed. (*Id.*). Second, Petitioner requested a stay of the order and hearing because the district court did not have Article III jurisdiction to go forward with the hearings and order Petitioner's principal to appear at a hearing after the cases have been dismissed. (Appx184-185). Third, Petitioner requested that the district court disclose any evidence that Petitioner's disclosures were not accurate. (Appx185-186). The district court has not ruled on Petitioner's motion to stay.

The district court is therefore proceeding with the hearing on "concerns about the accuracy" of Petitioner's disclosures when there is no evidence to refute that Petitioner's disclosures or notices of compliance are accurate. Petitioner does not receive any non-recourse funding and Petitioner disclosed its sole owner, so it complied with the district court's two new standing orders. (*E.g.*, Appx179-180).

REASONS FOR ISSUING THE WRIT

Pursuant to the All Writs Act, appellate courts "may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law." 28 U.S.C. §1651(a).

Before a court may issue a writ, three conditions must be satisfied:

First, the party seeking issuance of the writ must have no other adequate means to attain the relief he desires--a condition designed to ensure that the writ will not be used as a substitute for the regular appeals process. Second, the petitioner must satisfy the burden of showing that his right to issuance of the writ is clear and indisputable. Third, even if the first two prerequisites have been met, the issuing court, in the exercise of its

discretion, must be satisfied that the writ is appropriate under the circumstances.

Cheney v. United States Dist. Court, 542 U.S. 367, 380-81 (2004) (internal citations omitted; emphases supplied). *See also In re Volkswagen Grp. of Am.*, 28 F.4th 1203, 1206-07 (Fed.Cir. 2022).

“The traditional use of the writ in aid of appellate jurisdiction both at common law and in the federal courts has been to confine [the court against which mandamus is sought] to a lawful exercise of its prescribed jurisdiction.” *Cheney v. United States Dist. Court*, 542 U.S. 367, 380 (2004) (*quoting Roche v. Evaporated Milk Ass’n*, 319 U.S. 21, 26 (1943)). “[W]hen a court has no judicial power to do what it purports to do -- when its action is not mere error but usurpation of power -- the situation falls precisely within the allowable use” of a writ. *De Beers*, 325 U.S. at 217. Mandamus is also “used as a means of policing compliance with the procedural rules... by using it to review orders that are part of a general practice adopted by the district court which is outside the scope of the rules.” *U.S. v. Christian*, 660 F.2d at 896 (quotation marks and internal citation removed); *see also* 16 WRIGHT & MILLER § 3932 (“The most common traditional statement is that the extraordinary writs are available to a court of appeals to prevent a district court from acting beyond its jurisdiction,”).

I. Petitioner Has A Clear And Indisputable Right To The Writ

A. The District Court Lacks Article III Jurisdiction to Proceed with the Hearing

The district court lacks jurisdiction to hold a hearing pursuant to its Hearing Order in view of the dismissal of the cases. “Under Article III of the Constitution, federal courts may adjudicate only actual, ongoing cases or controversies.” *Lewis v. Continental Bank Corp.*, 494 U.S. 472, 477 (1990). There is no ongoing case or controversy because Creekview timely voluntarily dismissed with prejudice the Jabra case, and in the Skullcandy case a joint stipulation of dismissal was filed, which was signed by both parties. (Appx171-172; Appx175-176). “The entry of such a stipulation of dismissal is effective automatically and does not require judicial approval.” *Nat’l Bank v. Marine City, Inc.*, 411 F.2d 674, 677 (3rd Cir. 1969). “[A]ny action by the district court after the filing of such a stipulation can have no force or effect because the matter has already been dismissed by the parties themselves without any court action.” *SmallBizPros, Inc. v. MacDonald*, 618 F.3d 458, 463 (3rd Cir. 2010)); *State Nat’l Ins. Co. v. County of Camden*, 824 F.3d 399, 407 (3rd Cir. 2016); *In re Bath and Kitchen Fixtures Antitrust Lit.*, 535 F.3d 161, 165 (3rd Cir. 2008) (internal citations omitted) (“A timely notice of voluntary dismissal invites no response from the district court and permits no interference by it.”); *Rosetti v. Shalala*, 12 F.3d 1216, 1217 n.2 (3rd Cir. 1993) (“[W]ithout a case or controversy, the district court lacked Article III jurisdiction” to take any further action in the

case.). When jurisdiction ceases to exist, “the only function remaining to the court is that of announcing the fact and dismissing the cause.” *Steel Co. v. Citizens for a Better Env’t*, 523 U.S. 83, 94 (1998). The district court therefore has no jurisdiction to hold the hearing required by its Hearing Order.

It is recognized and “well established that a federal court may consider collateral issues after an action is no longer pending.” *Willy v. Coastal Corp.*, 503 U.S. 131, 138 (1992) (quoting *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 395-396 (1990)). A court can, for example, determine collateral issues such as “whether the attorney has abused the judicial process, and, if so, what sanction would be appropriate.” *Id.* “Such an order implicates no constitutional concern because it ‘does not signify a district court’s assessment of the legal merits of the complaint.’” *Id.* Here, however, the district court has not identified any recognized collateral issues that could support the hearing after the dismissal of the cases. There was no pending motion by any defendant and no suggestion that any attorney had acted improperly. The district court has only vaguely alleged “concerns about the accuracy” of Petitioner’s disclosures and, despite Petitioner’s requests, the district court has provided no further explanation for its Hearing Order. In contrast, Petitioner’s disclosure and declaration indisputably show that Petitioner complied with the standing orders and there is no evidence to the contrary. (See Appx169-170; Appx179-180). Without any dispute to address, the district court should remain

a “passive instrument[] of government” and “should not[] sally forth... looking for wrongs to right.” *United States v. Sineneng-Smith*, 140 S. Ct. 1575, 1579 (2020) (citation omitted). The district court therefore lacks Article III jurisdiction to enforce its Hearing Order and hold the hearing.

B. Regardless of Jurisdiction, the District Court’s Investigation and Two Standing Orders Are Barred from Consideration by Statute, the Federal Rules, and This Court’s Precedent

Proceeding with the district court’s investigation is also improper because the two underlying standing orders that serve as the basis for the district court’s investigation are an abuse of discretion because they seek information that is barred from consideration by the Patent Act and this Court’s precedent. In prior evidentiary hearings like the one the district court intends to hold in this case, the district court has provided only one justification for the two standing orders and the Hearing Order: the district court is interested in determining “whether the real parties in interest are before the Court.” (Appx277 at lines 20-23; Appx281 at lines 5-23; Appx216 at 107:14-19). But if this is the basis for the district court’s actions, the effort is fatal for two reasons. First, any question of “real party in interest” constitutes the “court’s assessment of the legal merits of the complaint,” which the district court has no jurisdiction to pursue after the cases were dismissed. *Willy*, 503 U.S. at 138.

Second, Congress had already disallowed such inquiries, and, thus, the district court's stated justification only reinforces that the district court's orders constitute an abuse of discretion. The Patent Act states plainly and unequivocally that a "patentee shall have remedy by civil action for infringement of his patent." 35 U.S.C. §281. Congress defined the term "patentee" as "includ[ing] not only the patentee to whom the patent was issued but also the successors in title to the patentee." 35 U.S.C. §100. Thus, Congress provided that the legal title holder to a patent, and only the legal title holder, could enforce a patent.

Further, directly related to the district court's concern of the real parties in interest, Fed.R.Civ.P. Rule 17(a)(1) provides that "[a]n action must be prosecuted in the name of the real party in interest," and then further defined that:

The following may sue in their own names without joining the *person for whose benefit the action is brought*: ***

(G) a party authorized by statute.

(Emphasis added). Thus, Congress provided that only the legal title holder of a patent—the patentee—can sue and is the only real party in interest. And Congress explicitly stated that a "person for whose benefit the action is brought" was *not* the proper plaintiff.

The necessary consequence of the above statutes is that Congress made the choice that "person[s] for whose benefit the action is brought" are inconsequential in patent enforcement. The courts cannot consider facts relating to who might be

the beneficiaries of patent enforcement. This is so because where the statutes and rules clearly define the sole real party in interest, the district court has no right to choose to pursue other parties in interest. The classic *expressio unius est exclusio alterius* canon of statutory construction states that the expression of one thing in the Patent Act and the Federal Rules implies the exclusion of others. *Leatherman v. Tarrant Cnty. Narcotics Intel. & Coordination Unit*, 507 U.S. 163, 168 (1993) (“the Federal Rules do address in Rule 9(b) the question of the need for greater particularity in pleading certain actions, but do not include among the enumerated actions any reference to complaints alleging municipal liability under §1983. *Expressio unius est exclusio alterius.*”).

Consistent with 35 U.S.C. §§100 and 281 and Rule 17(a)(1), this Court has held that “[t]he Patent Act provides that *only* a patentee shall have remedy by civil action for infringement of his patent.” *Paradise Creations, Inc. v. U V Sales, Inc.*, 315 F.3d 1304, 1308 (Fed.Cir. 2003) (emphases supplied, internal quotes omitted); *see also Uniloc USA, Inc. v. Apple Inc.*, 784 F.App’x 763, 766 (Fed.Cir. 2019) (same); *Univ. of S. Fla. Rsch. Found., Inc. v. Fujifilm Med. Sys. U.S.A.*, 19 F.4th 1315, 1319 (Fed.Cir. 2021) (“Only a ‘patentee’ may bring a civil action for patent infringement”).

Further, this Court has also held that “[t]he Supreme Court has long held that ‘the profits or damages for infringement cannot be sued for except on the basis of

title as patentee, or as such assignee or grantee, to the whole or a part of the patent, and not on the basis merely of the assignment of a right to a claim for profits and damages, severed from such title.” *Prima Tek II, L.L.C. v. A-Roo Co.*, 222 F.3d 1372, 1381 (Fed.Cir. 2000) (*quoting Crown Die & Tool Co. v. Nye Tool & Mach. Works*, 261 U.S. 24, 42 (1923) in parenthetical).

Nor does it matter that a person other than patent owner has some equitable interest in a patent. “[A] party is not co-owner of a patent for standing purposes merely because he or she holds an equitable interest in the patent” because “a co-owner must hold legal title to the patent.” *Taylor v. Taylor Made Plastics, Inc.*, 565 F. App’x 888, 889 (Fed.Cir. 2014) (*citing Arachnid, Inc. v. Merit Indus., Inc.*, 939 F.2d 1574, 1578-82 (Fed.Cir. 1991) and *Crown Die*, 261 U.S. at 40-41).

Thus, the district court’s pursuit of “real parties in interest” is an affront to the plain language of the Patent Act and the Federal Rules, as well as this Court’s precedent. It does not matter if a Plaintiff patent owner has funding or if other persons have some interest in the litigation or even if some third-party may have some equitable rights in the patent. Nor is the entire “chain of ownership” of the Petitioner patent owner relevant. The only relevant issue is whether Petitioner is the legal title holder to the patents-in-suit – i.e., is the patentee. Hypothetically, a third-party can by contract own 100% of the recovery in a patent suit but 35 U.S.C. §100

and Rule 17(a)(1)(G) still allow only the patent owner to be the party plaintiff and “real party in interest.”

Similarly, there is no abuse or threat to the judicial system if the legal title holders prosecute patent cases without disclosing who might be other parties in interest (including any chain of ownership for the patent owner) or who might be making litigation decisions, because that is what Congress has demanded.³ The only threat and abuse of the judicial system occurs is when anyone defies Congress’ choice and attempts to rewrite patent law.

The district court’s demands at transparency defy the law by demanding disclosures that Congress deemed irrelevant. Mandamus is necessary to prevent the district court’s usurpation of Congress’ judgment precluding the type of inquiry that the district court has begun to pursue *sua sponte*. *In re Volkswagen Grp. of Am.*, 28 F.4th 1203, 1214 (Fed.Cir. 2022) (petition for a writ of mandamus granted because “the district court’s venue conclusions were a clear abuse of discretion for erroneously interpreting governing law and reaching a patently erroneous result”).

³ There can be no issue as to the fact that Petitioner is the owner of the patent. Courts can take judicial notice that the patent was assigned to Petitioner because the assignment was recorded in the U.S. Patent and Trademark Office as reflected on the official USPTO Patent Center. *Cf.*, *Pandrol USA, LP v. Airboss Ry. Prods.*, 320 F.3d 1354, 1368 (Fed.Cir. 2003).

C. The Interests of Judicial and Patent Policy Support Issuing the Writ

Patent policy may be considered when interpreting statutes, but patent policy cannot be invoked to change the course promulgated by Congress. “[T]he choice of what patent policy should be lies first and foremost with Congress.” *Kimble v. Marvel Entm’t, LLC*, 576 U.S. 446, 463 (2015). Even if there were merit to the district court’s concerns, then in this case as in any other “Congress ... is [the] proper audience.” *Id.*; see also *Sony Corp. of Am. v. Universal City Studios, Inc.*, 464 U.S. 417, 430-31 (1984) (“[A]s new developments have occurred in this country, it has been the Congress that has fashioned the new rules that technology made necessary”); *Biotechnology Indus. Org. v. District of Columbia*, 496 F.3d 1362, 1373 (Fed.Cir. 2007) (“Congress, as the promulgator of patent policy, is charged with balancing these disparate goals. The present patent system reflects the result of Congress’s deliberations. Congress has decided that patentees’ present amount of exclusionary power, the present length of patent terms, and the present conditions for patentability represent the best balance between exclusion and free use”).

The district court’s standing orders do not apply patent policy and instead change it. Congress decreed that only the patent owner may enforce a patent and is the only party in interest. There are manifest reasons for Congress’ judgment, not the least being avoiding the disruptions and invasion of privacy that would be incurred in trying to divine who might have “real interests” in a patent as reflected

by the district court's standing orders. The demanded evidentiary hearing on the district court's standing orders does not address anything remotely relevant to the laws that Congress wrote.

II. Petitioner Has No Other Adequate Means to Obtain Relief

Mandamus is the only way for Petitioner to obtain relief here. The cases have been dismissed so there will be no final judgement to appeal. Petitioner has complied with the district court's standing orders⁴ and submitted a supporting declaration of compliance. There is no evidence to refute Petitioner's compliance. Without this Court's intervention, the district court will continue its post-dismissal prosecutorial path of forcing Petitioner to be subject to the interrogation by the district court without any basis for the district court's alleged "concerns about the accuracy" of Petitioner's disclosures.

III. Mandamus Is Appropriate Here Because the District Court Has Undertaken an Illegal and Unprecedented Crusade Trying to Enforce its Own Patent Policy in Derogation of Congress' Prerogative and This Court's Precedent

This Court has noted that *Cheney*'s third factor is "a relatively broad and

⁴ Despite Petitioner's responses to the standing orders, no response by Petitioner to either standing order was actually required. As explained above, the standing order on ownership did not require a disclosure by limited liability *company*, and the standing order on third-party funding did not require disclosure when a party only received recourse funding.

amorphous totality of the circumstances consideration.” *Mote v. Wilkie*, 976 F.3d 1337, 1343 (Fed.Cir. 2020) (quoting *In re Kellogg Brown & Root, Inc.*, 756 F.3d 754, 762 (D.C. Cir. 2014) (Kavanaugh, J.)). *Cheney’s* “phrasing suggests that the third factor is intended more as a final check on granting the writ than as an amorphously discretionary means of denying it, without consulting the other two factors.” *Id.*

The standing orders and Hearing Order manifest that the district court is seeking to create a new patent policy requiring disclosure of the “real parties in interest.” Despite the cases being dismissed by a timely voluntary dismissal and joint stipulation, respectively, and the Petitioner’s undisputed compliance with the standing orders, the district court is proceeding with prosecuting Petitioner to enforce the district court’s newly created “real party in interest” patent policy. Whether the policy is laudable or capricious, patent policies are made by Congress and not by judges. Petitioner acted according to law and was entitled to enforce its patent in accordance with established law. The district court’s inquisition is plainly designed to establish that persons other than Petitioner control the litigations and benefit from the litigations. Whether that is true or not, the inquisition is legally irrelevant and is legally indefensible.

Indeed, it is not even apparent what concerns the district court beyond nebulous concern for who makes litigation decisions or may be a real party in

interest. The district court is effectively a lone-wolf prosecutor, conducting an open-ended investigation without any legal justification or providing any basis. *Sineneng-Smith*, 140 S. Ct. at 1579 (Courts are “passive instrument[] of government” that “should not[] sally forth... looking for wrongs to right.”).

The district court’s inquisition in these cases is also not a one-off procedure, *e.g.*, the *Nimitz* petition, which weighs in favor of mandamus. Despite this Court staying the district court’s continued investigation in the *Nimitz* cases, *Nimitz*, Appeal No. 2023-103, Doc. 5 (Fed.Cir. Nov. 17, 2022), the district court is continuing to conduct hearings in these cases and other cases on the same issue raised in *Nimitz*. Thus, the district court is implementing its new policy in a series of cases.

The present exceptional circumstances warrant immediate review, and the district court’s aberrant policy is a subject particularly fit for mandamus because its novel policy directly impacts “proper judicial administration” across a number of cases. *In re Volkswagen Grp. of Am.*, 28 F.4th 1203, 1207 (Fed.Cir. 2022); *United States v. United States Dist. Court for the Dist. of Nev.*, 791 F.3d 945, 960 (9th Cir. 2015) (“The fact that Judge Jones's order in this case was not an isolated occurrence weighed in favor of granting mandamus relief when the petition was filed.”).

Citing *Schlagenhauf*, the Court has also noted that “[t]he Supreme Court has confirmed that the requirements for mandamus are satisfied when the district court’s

decision involves ‘basic’ and ‘undecided’ legal questions.” *In re Google LLC*, 949 F.3d 1338, 1341 (Fed.Cir. 2020).

This Court has also held that:

Importantly, the Supreme Court has confirmed that mandamus relief may be appropriate in certain circumstances to decide “basic” and “undecided” questions. In addition, mandamus may be appropriate “to further supervisory or instructional goals where issues are unsettled and important.”

In re BigCommerce, Inc., 890 F.3d 978, 981 (Fed.Cir. 2018) (quoting and citing *Schlagenhauf* and *In re Queen’s Univ. at Kingston*, 820 F.3d 1287, 1291 (Fed.Cir. 2016)).

CONCLUSION AND STATEMENT OF RELIEF SOUGHT

For the foregoing reasons, Petitioner respectfully requests that the Court issue a writ of mandamus directing the district court to vacate its Hearing Order and cease the district court’s judicial investigation of the Petitioner.

Respectfully Submitted,

November 30, 2022

/s/ David R. Bennett

DAVID R. BENNETT

DIRECTION IP LAW

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Attorneys for Petitioner Creekview IP LLC

ADDENDUM

ADDENDUM TABLE OF CONTENTS

Memorandum Order (“Hearing Order”) entered on September 12, 2022 (C.A. No. 22-cv-426 Doc. No. 15)	Appx001-002
Standing Order Regarding Disclosure Statements required by Federal Rule of Civil Procedure dated April 18, 2022 (Chief Judge Colm F. Connolly)	Appx003
Standing Order Regarding Third-Party Litigation Funding Arrangements dated April 18, 2022 (Chief Judge Colm F. Connolly)	Appx004-005

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CREEKVIEW IP LLC,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 22-426-CFC
)	
JABRA CORPORATION,)	
)	
Defendant.)	

CREEKVIEW IP LLC,)	
)	
Plaintiff,)	
)	
v.)	Civ. No. 22-427-CFC
)	
SKULLCANDY INC.,)	
)	
Defendant.)	

MEMORANDUM ORDER

Whereas the amended corporate disclosure statements filed by Plaintiff in the above-captioned cases identify Jacob LaPray as Plaintiff's owner; and

Whereas the Court has concerns about the accuracy of those statements and whether Plaintiff has complied with the Court's standing order regarding third-party litigation funding;

NOW THEREFORE, at Wilmington on this Twelfth day of September in 2022, it is HEREBY ORDERED that:

1. The Court will hold on December 6, 2022 at 1:00 p.m. an evidentiary hearing to determine whether the amended corporate disclosure statements are accurate and whether Plaintiff has complied with the Court's standing order regarding third-party litigation funding;
2. The following individuals shall attend the hearing in person: Jimmy Chong and Jacob LaPray.

Chas. F. Conolly
CHIEF JUDGE

CHIEF JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STANDING ORDER REGARDING DISCLOSURE STATEMENTS
REQUIRED BY FEDERAL RULE OF CIVIL PROCEDURE 7.1

At Wilmington on this Eighteenth day of April in 2022, it is HEREBY ORDERED in all cases assigned to Judge Connolly where a party is a nongovernmental joint venture, limited liability corporation, partnership, or limited liability partnership, that the party must include in its disclosure statement filed pursuant to Federal Rule of Civil Procedure 7.1 the name of every owner, member, and partner of the party, proceeding up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.


Chief Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STANDING ORDER REGARDING
THIRD-PARTY LITIGATION FUNDING ARRANGEMENTS

At Wilmington on this Eighteenth day of April in 2022, it is HEREBY ORDERED in all cases assigned to Chief Judge Connolly where a party has made arrangements to receive from a person or entity that is not a party (a “Third-Party Funder”) funding for some or all of the party’s attorney fees and/or expenses to litigate this action on a non-recourse basis in exchange for (1) a financial interest that is contingent upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal loan, bank loan, or insurance:

1. Within the later of 45 days of this Order or 30 days of the filing of an initial pleading or transfer of the matter to this District, including the removal of a state action, the party receiving such funding shall file a statement (separate from any pleading) containing the following information:

a. The identity, address, and, if a legal entity, place of formation of the Third-Party Funder(s);

b. Whether any Third-Party Funder’s approval is necessary for litigation or settlement decisions in the action, and if the answer is in the

affirmative, the nature of the terms and conditions relating to that approval;
and

c. A brief description of the nature of the financial interest of the
Third-Party Funder(s).

2. Parties may seek additional discovery of the terms of a party's
arrangement with any Third-Party Funder upon a showing that the Third-Party
Funder has authority to make material litigation decisions or settlement decisions,
the interests of any funded parties or the class (if applicable) are not being
promoted or protected by the arrangement, conflicts of interest exist as a result of
the arrangement, or other such good cause exists.

3. Nothing herein precludes the Court from ordering such other relief as
may be appropriate.



Chief Judge

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Federal Circuit by using the appellate CM/ECF system on November 30, 2022.

A copy of the foregoing was served upon the following counsel of record by electronic mail and upon the district court by overnight delivery:

Via Email to counsel for Defendants:

Chad S.C. Stover, Barnes & Thornburg LLP, 1000 North West Street, Suite 1500, Wilmington, DE 19801, chad.stover@btlaw.com; and

Glenn R. Bronson, J. Jeffrey Gunn, and James C. Watson, Trask Britt P.C., 230 South 500 East, Suite 300, Salt Lake City, UT 84101, GRBronson@traskbritt.com, JGunn@traskbritt.com, JCWatson@traskbritt.com

Anne Shae Gaza, Young, Conaway, Stargatt & Taylor LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, agaza@ycst.com

Via Overnight Delivery to the Court:

The Honorable Colm F. Connolly
J. Caleb Boggs Federal Building
844 N. King Street
Unit 31
Room 4124
Wilmington, DE 19801-3555

November 30, 2022

/s/ David R. Bennett

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Direction IP Law

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Chicago, IL 60614
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dbennett@directionip.com

CERTIFICATE OF COMPLIANCE

The foregoing Petition filing complies with the relevant type-volume limitation of the of Fed. R. App. P. 21(d)(1) because this petition has been prepared using a 14-point proportionally-spaced typeface and includes 5,348 words.

November 30, 2022

/s/ David R. Bennett

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Chicago, IL 60614

D: (312) 291-1667

dbennett@directionip.com

2022-

**United States Court of Appeals
for the Federal Circuit**

In Re

CREEKVIEW IP LLC,

Petitioner.

*On Petition for Writ of Mandamus to the United States District Court for the
District of Delaware, Case Nos. 22-cv-0426-CFC, 22-cv-0427-CFC,
Honorable Colm F. Connolly, Judge*

**APPENDIX IN SUPPORT OF TO
PETITION FOR A WRIT OF MANDAMUS**

DAVID R. BENNETT
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*Counsel for Petitioner
Creekview IP LLC*

November 30, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CREEKVIEW IP LLC,)
)
 Plaintiff,)
)
 v.) Civ. No. 22-426-CFC
)
 JABRA CORPORATION,)
)
 Defendant.)

CREEKVIEW IP LLC,)
)
 Plaintiff,)
)
 v.) Civ. No. 22-427-CFC
)
 SKULLCANDY INC.,)
)
 Defendant.)

MEMORANDUM ORDER

Whereas the amended corporate disclosure statements filed by Plaintiff in the above-captioned cases identify Jacob LaPray as Plaintiff's owner; and

Whereas the Court has concerns about the accuracy of those statements and whether Plaintiff has complied with the Court's standing order regarding third-party litigation funding;

NOW THEREFORE, at Wilmington on this Twelfth day of September in 2022, it is HEREBY ORDERED that:

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STANDING ORDER REGARDING DISCLOSURE STATEMENTS
REQUIRED BY FEDERAL RULE OF CIVIL PROCEDURE 7.1

At Wilmington on this Eighteenth day of April in 2022, it is HEREBY ORDERED in all cases assigned to Judge Connolly where a party is a nongovernmental joint venture, limited liability corporation, partnership, or limited liability partnership, that the party must include in its disclosure statement filed pursuant to Federal Rule of Civil Procedure 7.1 the name of every owner, member, and partner of the party, proceeding up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.


Chief Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STANDING ORDER REGARDING
THIRD-PARTY LITIGATION FUNDING ARRANGEMENTS

At Wilmington on this Eighteenth day of April in 2022, it is HEREBY ORDERED in all cases assigned to Chief Judge Connolly where a party has made arrangements to receive from a person or entity that is not a party (a “Third-Party Funder”) funding for some or all of the party’s attorney fees and/or expenses to litigate this action on a non-recourse basis in exchange for (1) a financial interest that is contingent upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal loan, bank loan, or insurance:

1. Within the later of 45 days of this Order or 30 days of the filing of an initial pleading or transfer of the matter to this District, including the removal of a state action, the party receiving such funding shall file a statement (separate from any pleading) containing the following information:

a. The identity, address, and, if a legal entity, place of formation of the Third-Party Funder(s);

b. Whether any Third-Party Funder’s approval is necessary for litigation or settlement decisions in the action, and if the answer is in the

affirmative, the nature of the terms and conditions relating to that approval;
and

c. A brief description of the nature of the financial interest of the
Third-Party Funder(s).

2. Parties may seek additional discovery of the terms of a party's
arrangement with any Third-Party Funder upon a showing that the Third-Party
Funder has authority to make material litigation decisions or settlement decisions,
the interests of any funded parties or the class (if applicable) are not being
promoted or protected by the arrangement, conflicts of interest exist as a result of
the arrangement, or other such good cause exists.

3. Nothing herein precludes the Court from ordering such other relief as
may be appropriate.



Chief Judge

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STAYED,PATENT

U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:22-cv-00426-CFC

Creekview IP LLC v. Jabra Corporation

Assigned to: Judge Colm F. Connolly

Related Cases: [1:21-cv-01685-CFC](#)[1:21-cv-01686-CFC](#)[1:22-cv-00425-CFC](#)[1:22-cv-00428-CFC](#)[1:22-cv-00427-CFC](#)

Cause: 35:271 Patent Infringement

Date Filed: 03/31/2022

Jury Demand: Plaintiff

Nature of Suit: 830 Patent

Jurisdiction: Federal Question

Plaintiff**Creekview IP LLC**

represented by **Jimmy C. Chong**
 Chong Law Firm, PA
 2961 Centerville Rd., Ste 350
 Wilmington, DE 19808
 302-999-9480
 Fax: 302-800-1999
 Email: chong@chonglawfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant**Jabra Corporation**

represented by **Anne Shea Gaza**
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 Rodney Square
 1000 North King Street
 Wilmington, DE 19801
 (302) 571-6727
 Email: agaza@ycst.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/31/2022	1 R	COMPLAINT FOR PATENT INFRINGEMENT - filed with Jury Demand against Jabra Corporation - Magistrate Consent Notice to Pltf. (Filing fee \$ 402, receipt number ADEDC-3839415.) - filed by Creekview IP LLC. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Civil Cover Sheet, # 4 Related Cases)(mal) (Entered: 03/31/2022)
03/31/2022	2	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (mal)

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		(Entered: 03/31/2022)
03/31/2022	3	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 9,608,472. (mal) (Entered: 03/31/2022)
03/31/2022	4	Disclosure Statement pursuant to Rule 7.1: No Parents or Affiliates Listed filed by Creekview IP LLC. (mal) (Entered: 03/31/2022)
03/31/2022	5	Summons Issued as to Jabra Corporation on 3/31/2022. (mal) (Entered: 03/31/2022)
04/05/2022	6	SUMMONS Returned Executed by Creekview IP LLC. Jabra Corporation served on 4/4/2022, answer due 4/25/2022. (Chong, Jimmy) (Entered: 04/05/2022)
04/06/2022		Case Assigned to Judge Colm F. Connolly. Please include the initials of the Judge (CFC) after the case number on all documents filed. Associated Cases: 1:22-cv-00425-CFC, 1:22-cv-00426-CFC, 1:22-cv-00427-CFC, 1:22-cv-00428-CFC (rjb) (Entered: 04/06/2022)
04/14/2022	7	MOTION for Pro Hac Vice Appearance of Attorney Scott A. McKeown and Matthew J. Rizzolo - filed by Jabra Corporation. (Gaza, Anne) (Entered: 04/14/2022)
04/18/2022		SO ORDERED, re 7 MOTION for Pro Hac Vice Appearance of Attorney Scott A. McKeown and Matthew J. Rizzolo, filed by Jabra Corporation. Ordered by Judge Colm F. Connolly on 4/18/2022. (kmd) (Entered: 04/18/2022)
04/19/2022	8	STIPULATION TO EXTEND TIME for Defendant to answer, move against, or otherwise respond to the Complaint to May 25, 2022 - filed by Jabra Corporation. (Gaza, Anne) (Entered: 04/19/2022)
04/19/2022		SO ORDERED, re 8 STIPULATION TO EXTEND TIME for Defendant to answer, move against, or otherwise respond to the Complaint to May 25, 2022, filed by Jabra Corporation. Reset Answer Deadlines: Jabra Corporation answer due 5/25/2022. Ordered by Judge Colm F. Connolly on 4/19/2022. (kmd) (Entered: 04/19/2022)
05/16/2022	9	STIPULATION to Stay <i>All Deadlines and Notice of Settlement to 06/24/2022</i> - filed by Creekview IP LLC. (Chong, Jimmy) Modified on 5/16/2022 (kmd). (Entered: 05/16/2022)
05/16/2022		SO ORDERED, re 9 STIPULATION to Stay <i>All Deadlines and Notice of Settlement to 06/24/2022</i> , filed by Creekview IP LLC. Case stayed. Ordered by Judge Colm F. Connolly on 5/16/2022. (kmd) (Entered: 05/16/2022)
06/22/2022	10	STIPULATION to Continue Stay by Jabra Corporation. (Wilson, Samantha) (Entered: 06/22/2022)
06/23/2022		SO ORDERED, re 10 Stipulation to Continue Stay, filed by Jabra Corporation. Ordered by Judge Colm F. Connolly on 6/23/2022. (kmd) (Entered: 06/23/2022)
07/21/2022	11	STIPULATION to continue the stay of all hearings and deadlines between the parties through August 24, 2022 by Jabra Corporation. (Gaza, Anne) (Entered: 07/21/2022)
07/21/2022		SO ORDERED, re 11 Stipulation to continue the stay of all hearings and deadlines between the parties through August 24, 2022, filed by Jabra Corporation. Signed by Judge Colm F. Connolly on 6/21/2022. (kmd) (Entered: 07/21/2022)
08/23/2022	12	STIPULATION to continue the stay of all hearings and deadlines between the parties through October 24, 2022. by Jabra Corporation. (Wilson, Samantha) (Entered: 08/23/2022)
08/23/2022	13	SO ORDERED, re 12 Stipulation to continue the stay of all hearings and deadlines between the parties through October 24, 2022, filed by Jabra Corporation. Signed by

		Judge Colm F. Connolly on 8/23/2022. (kmd) (Entered: 08/23/2022)
09/02/2022	14 R	AMENDED DOCUMENT by Creekview IP LLC. Amendment to 4 Disclosure Statement . (Chong, Jimmy) (Entered: 09/02/2022)
09/12/2022	15 R	MEMORANDUM ORDER Setting Hearings: An Evidentiary Hearing is set for 12/6/2022 at 01:00 PM in Courtroom 4B before Judge Colm F. Connolly to determine whether the amended corporate disclosure statements are accurate and whether Plaintiff has complied with the Court's standing order regarding third-party litigation funding. The following individuals shall attend the hearing in person: JimmyChong and Jacob LaPray. Signed by Judge Colm F. Connolly on 9/12/2022. (nmf) (Entered: 09/12/2022)
10/06/2022	16 R	NOTICE of Voluntary Dismissal by Creekview IP LLC as to Jabra Corporation (Chong, Jimmy) (Entered: 10/06/2022)
10/06/2022	17 R	STATEMENT <i>Regarding Third-Party Litigation Funding Arrangements</i> by Creekview IP LLC. (Chong, Jimmy) (Entered: 10/06/2022)
10/06/2022	18 R	Letter to The Honorable Colm F. Connolly from Jimmy Chong regarding In response to Court's Memorandum Order - re (19 in 1:22-cv-00427-CFC, 19 in 1:22-cv-00427-CFC, 15 in 1:22-cv-00426-CFC, 15 in 1:22-cv-00426-CFC) Memorandum and Order,, Set Hearings,. (Attachments: # 1 R Affidavit Declaration of Jacob LaPray)(Chong, Jimmy) (Entered: 10/06/2022)
11/18/2022	19 R	MOTION to Stay - filed by Creekview IP LLC. (Attachments: # 1 Text of Proposed Order)(Chong, Jimmy) (Entered: 11/18/2022)

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Transaction Receipt			
11/30/2022 01:26:43			
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Billable Pages:	3	Cost:	0.30

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PATENT

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:22-cv-00427-CFC**

Creekview IP LLC v. Skullcandy Inc.
Assigned to: Judge Colm F. Connolly

Related Cases: [1:21-cv-01685-CFC](#)
[1:21-cv-01686-CFC](#)
[1:22-cv-00426-CFC](#)
[1:22-cv-00425-CFC](#)
[1:22-cv-00428-CFC](#)

Date Filed: 03/31/2022
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Cause: 35:271 Patent Infringement

Plaintiff

Creekview IP LLC

represented by **Jimmy C. Chong**
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Wilmington, DE 19808
302-999-9480
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Email: chong@chonglawfirm.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

Skullcandy Inc.

represented by **Glenn R. Bronson**
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PRO HAC VICE
ATTORNEY TO BE NOTICED

J. Jeffrey Gunn
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PRO HAC VICE
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James C. Watson
Email: JCWatson@traskbritt.com
PRO HAC VICE
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Chad S.C. Stover
Barnes & Thornburg LLP
222 Delaware Avenue Suite 1200

APPX009

Wilmington, DE 19801
 302-300-3474
 Email: chad.stover@btlaw.com
ATTORNEY TO BE NOTICED






Counter Claimant**Skullcandy Inc.**

represented by **Chad S.C. Stover**
 (See above for address)
ATTORNEY TO BE NOTICED

V.

Counter Defendant**Creekview IP LLC**

represented by **Jimmy C. Chong**
 (See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
03/31/2022	1 	COMPLAINT for PATENT INFRINGEMENT filed with Jury Demand against Skullcandy Inc. - Magistrate Consent Notice to Pltf. (Filing fee \$ 402, receipt number ADEDC-3839426.) - filed by Creekview IP LLC. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Civil Cover Sheet)(mpb) (Entered: 03/31/2022)
03/31/2022	2	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (mpb) (Entered: 03/31/2022)
03/31/2022	3	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 9,608,472. (mpb) (Entered: 03/31/2022)
03/31/2022	4 	Disclosure Statement pursuant to Rule 7.1: No Parents or Affiliates Listed filed by Creekview IP LLC. (mpb) (Entered: 03/31/2022)
03/31/2022	5	Summons Issued as to Skullcandy Inc. on 3/31/2022. (mpb) (Entered: 03/31/2022)
04/05/2022	6	SUMMONS Returned Executed by Creekview IP LLC. Skullcandy Inc. served on 4/4/2022, answer due 4/25/2022. (Chong, Jimmy) (Entered: 04/05/2022)
04/06/2022		Case Assigned to Judge Colm F. Connolly. Please include the initials of the Judge (CFC) after the case number on all documents filed. Associated Cases: 1:22-cv-00425-CFC, 1:22-cv-00426-CFC, 1:22-cv-00427-CFC, 1:22-cv-00428-CFC (rjb) (Entered: 04/06/2022)
04/12/2022	7	STIPULATION TO EXTEND TIME to Answer the Complaint to 05/25/2022 - filed by Creekview IP LLC. (Chong, Jimmy) (Entered: 04/12/2022)
04/12/2022		SO ORDERED, re 7 STIPULATION TO EXTEND TIME to Answer the Complaint to 05/25/2022, filed by Creekview IP LLC. Reset Answer Deadlines: Skullcandy Inc. answer due 5/25/2022. Ordered by Judge Colm F. Connolly on 4/12/2022. (kmd) (Entered: 04/12/2022)
05/25/2022	8 	ANSWER to 1  Complaint, with Jury Demand , COUNTERCLAIM against Creekview IP LLC by Skullcandy Inc..(Stover, Chad) (Entered: 05/25/2022)
05/25/2022	9 	Disclosure Statement pursuant to Rule 7.1: identifying Corporate Parent MRSK Hold

APPX010

		Co. for Skullcandy Inc. filed by Skullcandy Inc.. (Stover, Chad) (Entered: 05/25/2022)
05/25/2022	10	MOTION for Pro Hac Vice Appearance of Attorney Glenn R. Bronson, J. Jeffrey Gunn and James C. Watson - filed by Skullcandy Inc.. (Attachments: # 1 Certification by Counsel to be Admitted Pro Hac Vice (Glenn R. Bronson), # 2 Certification by Counsel to be Admitted Pro Hac Vice (J. Jeffrey Gunn), # 3 Certification by Counsel to be Admitted Pro Hac Vice (James C. Watson))(Stover, Chad) (Entered: 05/25/2022)
05/25/2022		SO ORDERED, re 10 MOTION for Pro Hac Vice Appearance of Attorney Glenn R. Bronson, J. Jeffrey Gunn and James C. Watson, filed by Skullcandy Inc. Ordered by Judge Colm F. Connolly on 5/25/2022. (kmd) (Entered: 05/25/2022)
06/07/2022	11	ORDER: IT IS ORDERED that, on or before July 8, 2022, counsel for plaintiff shall inform the court as to whether the need for coordinated discovery and/or Markman proceedings is anticipated as to these cases and, if so, when a joint scheduling conference might most efficiently be conducted. ORDER, Setting Deadlines: (Notice of Compliance deadline set for 7/8/2022.) Signed by Judge Colm F. Connolly on 6/7/2022. Associated Cases: 1:22-cv-00425-CFC, 1:22-cv-00427-CFC, 1:22-cv-00428-CFC(nmf) (Entered: 06/07/2022)
06/15/2022	12	ANSWER to 8 R Answer to Complaint, Counterclaim by Creekview IP LLC.(Chong, Jimmy) (Entered: 06/15/2022)
06/20/2022	13	NOTICE of Change of Address by Chad S.C. Stover (Stover, Chad) (Entered: 06/20/2022)
07/08/2022	14	NOTICE of Coordination by Creekview IP LLC re (9 in 1:22-cv-00428-CFC, 9 in 1:22-cv-00428-CFC, 11 in 1:22-cv-00427-CFC, 11 in 1:22-cv-00427-CFC, 11 in 1:22-cv-00425-CFC, 11 in 1:22-cv-00425-CFC) Order,,, Set Deadlines,, (Chong, Jimmy) (Entered: 07/08/2022)
07/20/2022	15	Order Setting Telephonic Scheduling Conference: A Scheduling Conference is set for 8/31/2022 at 09:00 AM Telephonically before Judge Colm F. Connolly. Unless otherwise agreed to by the parties, trial in this case shall begin May 19, 2025. If the parties have no disputes about the scheduling order, the Court will not require the parties to appear at a conference. Signed by Judge Colm F. Connolly on 7/20/2022. (nmf) (Entered: 07/20/2022)
07/25/2022		Pro Hac Vice Attorney James C. Watson for Skullcandy Inc. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 07/25/2022)
08/01/2022		Pro Hac Vice Attorney Glenn R. Bronson for Skullcandy Inc. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 08/01/2022)
08/01/2022		Pro Hac Vice Attorney J. Jeffrey Gunn for Skullcandy Inc. added for electronic noticing. Pursuant to Local Rule 83.5 (d)., Delaware counsel shall be the registered users of CM/ECF and shall be required to file all papers. (mpb) (Entered: 08/01/2022)
08/29/2022	16	PROPOSED ORDER Proposed Scheduling Order by Creekview IP LLC. (Chong, Jimmy) (Entered: 08/29/2022)
08/30/2022		The August 31, 2022 Scheduling Conference is canceled. (nmf) (Entered: 08/30/2022)
09/02/2022	17 R	AMENDED DOCUMENT by Creekview IP LLC. Amendment to 4 R Disclosure Statement . (Chong, Jimmy) (Entered: 09/02/2022)
09/12/2022	18	SCHEDULING ORDER: Joinder of Parties due by 9/30/2022. Amended Pleadings due

		by 9/30/2022. Fact Discovery completed by 11/1/2023. Expert Discovery due by 2/5/2024. Dispositive Motions due by 4/1/2024. Joint Claim Construction Brief due by 5/29/2023. A Markman Hearing is set for 6/7/2023 at 09:00 AM in Courtroom 4B before Judge Colm F. Connolly. Proposed Pretrial Order due by 8/19/2024. A Final Pretrial Conference is set for 10/31/2024 at 03:00 PM in Courtroom 4B before Judge Colm F. Connolly. A Jury Trial is set for 11/12/2024 at 08:30 AM in Courtroom 4B before Judge Colm F. Connolly. Signed by Judge Colm F. Connolly on 9/12/2022. (nmf) (Entered: 09/12/2022)
09/12/2022	19 R	MEMORANDUM ORDER Setting Hearings: An Evidentiary Hearing is set for 12/6/2022 at 01:00 PM in Courtroom 4B before Judge Colm F. Connolly to determine whether the amended corporate disclosure statements are accurate and whether Plaintiff has complied with the Court's standing order regarding third-party litigation funding. The following individuals shall attend the hearing in person: JimmyChong and Jacob LaPray. Signed by Judge Colm F. Connolly on 9/12/2022. (nmf) (Entered: 09/12/2022)
09/19/2022	20	NOTICE OF SERVICE of Skullcandy Inc.'s Initial Disclosures filed by Skullcandy Inc..(Stover, Chad) (Entered: 09/19/2022)
09/19/2022	21	NOTICE OF SERVICE of Plaintiff's Rule 26(a)(1) Initial Disclosures filed by Creekview IP LLC.(Chong, Jimmy) (Entered: 09/19/2022)
09/22/2022	22	PROPOSED ORDER Proposed Protective Order by Creekview IP LLC. (Chong, Jimmy) (Entered: 09/22/2022)
09/23/2022		Remark: The Proposed Protective Order filed at D.I. 22 does not contain the required language outlined on page 11 of the Scheduling Order. Please file a new Proposed Protective Order including the required language and a proposed order for the Court. (nmf) (Entered: 09/23/2022)
09/28/2022	23 R	Joint STIPULATION to Dismiss by Creekview IP LLC. (Chong, Jimmy) (Entered: 09/28/2022)
10/06/2022	24 R	STATEMENT <i>Regarding Third-Party Litigation Funding Arrangements</i> by Creekview IP LLC. (Chong, Jimmy) (Entered: 10/06/2022)
10/06/2022	25 R	Letter to The Honorable Colm F. Connolly from Jimmy Chong regarding In response to Court's Memorandum Order - re (19 in 1:22-cv-00427-CFC, 19 in 1:22-cv-00427-CFC, 15 in 1:22-cv-00426-CFC, 15 in 1:22-cv-00426-CFC) Memorandum and Order,, Set Hearings,. (Attachments: # 1 R Affidavit Declaration of Jacob LaPray)(Chong, Jimmy) (Entered: 10/06/2022)
11/18/2022	26 R	MOTION to Stay - filed by Creekview IP LLC. (Attachments: # 1 Text of Proposed Order)(Chong, Jimmy) (Entered: 11/18/2022)

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Description:	Docket Report	Search Criteria:	1:22-cv-00427-CFC Start date: 1/1/1973 End date: 11/30/2022
Billable Pages:	4	Cost:	0.40

APPX012

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<p>CREEKVIEW IP LLC,</p> <p style="padding-left: 40px;">Plaintiff,</p> <p style="padding-left: 40px;">v.</p> <p>JABRA CORPORATION,</p> <p style="padding-left: 40px;">Defendant.</p>	<p>Case No.</p> <p>Patent Case</p> <p>Jury Trial Demanded</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Creekview IP LLC (“Plaintiff”), through its attorneys, complains of Jabra Corporation (“Defendant”), and alleges the following:

PARTIES

1. Plaintiff Creekview IP LLC is a limited liability company with its principal place of business at 7548 Preston Rd, STE 141 PMB 1115, Frisco, TX 75034.
2. Upon information and belief, Defendant is a corporation organized under the laws of Delaware, having a principal place of business at 900 Chelmsford Street Tower II, 8th Floor Lowell, MA 01851. Upon information and belief, Defendant may be served with process c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

JURISDICTION

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.
4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Defendant because it has engaged in systematic and continuous business activities in this District. As described below, Defendant has committed acts of patent infringement giving rise to this action within this District.

VENUE

6. Venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant has committed acts of patent infringement in this District, and Defendant is incorporated in in this District. In addition, Plaintiff has suffered harm in this district.

PATENT-IN-SUIT

7. On March 28, 2017, the United States Patent and Trademark Office (“USPTO”) duly and legally issued U.S. Patent No 9,608,472 (the “‘472 Patent”), entitled “METHOD AND APPARATUS FOR WIRELESSLY TRANSFERRING POWER AND COMMUNICATING WITH ONE OR MORE SLAVE DEVICES” after a full and fair examination. The ‘472 Patent is attached hereto as Exhibit 1 and incorporated herein as if fully rewritten.
8. Plaintiff is presently the owner of the ‘472 Patent, having received all right, title and interest in and to the ‘472 Patent from the previous assignee of record. Plaintiff possesses all rights of recovery under the ‘472 Patent, including the exclusive right to recover for past infringement.
9. To the extent required, Plaintiff has complied with all marking requirements under 35 U.S.C. § 287.

COUNT 1: INFRINGEMENT OF THE ‘472 PATENT

10. Plaintiff incorporates the above paragraphs herein by reference.
11. **Direct Infringement.** Defendant has directly infringed one or more claims of the ‘472 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count

below (among the “Exemplary Defendant Products”) that infringe at least the exemplary claims of the ‘472 Patent also identified in the charts incorporated into this Count below (the “Exemplary ‘472 Patent Claims”) literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the ‘472 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

12. Defendants also have directly infringed, literally or under the doctrine of equivalents, the Exemplary '472 Patent Claims, by having its employees internally test and use these Exemplary Products.

13. Exhibit 2 includes charts comparing the Exemplary ‘472 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the ‘472 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary ‘472 Patent Claims.

14. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 2.

15. Plaintiff is entitled to recover damages adequate to compensate for Defendants' infringement.

JURY DEMAND

16. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

- A. A judgment that the ‘472 Patent is valid and enforceable;
- B. A judgment that Defendants have infringed, one or more claims of the ‘472 Patent;
- C. An accounting of all damages not presented at trial;

- D. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendants' infringement with respect to the '472 patent;
- E. And, if necessary, to adequately compensate Plaintiff for Defendants' infringement, an accounting:
 - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys' fees against Defendants that it incurs in prosecuting this action;
 - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and
 - iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: March 31, 2022

Respectfully submitted,

CHONG LAW FIRM PA

/s/Jimmy Chong

Jimmy Chong (#4839)

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Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: chong@chonglawfirm.com

**Counsel for Plaintiff
Creekview IP LLC**

(12) **United States Patent**
Moshfeghi

(10) **Patent No.:** **US 9,608,472 B2**
(45) **Date of Patent:** ***Mar. 28, 2017**

(54) **METHOD AND APPARATUS FOR
WIRELESSLY TRANSFERRING POWER
AND COMMUNICATING WITH ONE OR
MORE SLAVE DEVICES**

(58) **Field of Classification Search**
CPC combination set(s) only.
See application file for complete search history.

(56) **References Cited**

(71) Applicant: **Golba LLC**, Rancho Palos Verdes, CA
(US)

U.S. PATENT DOCUMENTS

(72) Inventor: **Mehran Moshfeghi**, Rancho Palos
Verdes, CA (US)

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(Continued)

(73) Assignee: **Golba LLC**, Rancho Palos Verde, CA
(US)

(*) Notice: Subject to any disclaimer, the term of this
patent is extended or adjusted under 35
U.S.C. 154(b) by 238 days.

This patent is subject to a terminal dis-
claimer.

OTHER PUBLICATIONS

(21) Appl. No.: **14/223,841**

Portions of prosecution history of U.S. Appl. No. 12/979,254, Mar.
3, 2014, Moshfeghi, Mehran.

(22) Filed: **Mar. 24, 2014**

(Continued)

(65) **Prior Publication Data**

US 2014/0203758 A1 Jul. 24, 2014

Primary Examiner — Yalkew Fantu

(74) *Attorney, Agent, or Firm* — Farjami & Farjami LLP

(57) **ABSTRACT**

Some embodiments provide a system for charging devices. The system includes a master device and a slave device. Some embodiments provide a method for charging devices in a system that includes a slave device and a master device. The slave device includes (1) an antenna to receive a radio frequency (RF) beam and (2) a power generation module connected to the antenna that converts RF energy received by the slave antenna to power. The master device includes (1) a directional antenna to direct RF power to the antenna of the slave device and (2) a module that provides power to the directional antenna of the master device.

Related U.S. Application Data

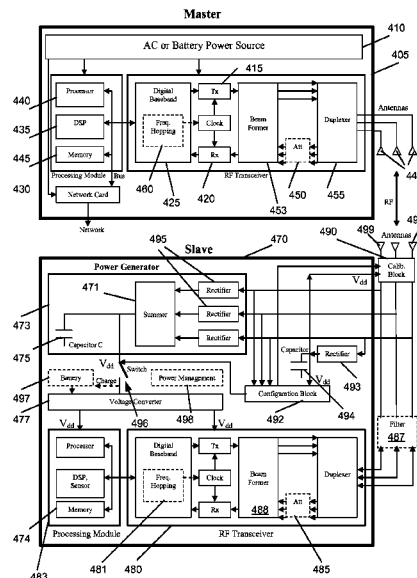
(63) Continuation of application No. 12/979,254, filed on
Dec. 27, 2010, now Pat. No. 8,686,685.

(60) Provisional application No. 61/290,184, filed on Dec.
25, 2009.

(51) **Int. Cl.**
H02J 7/00 (2006.01)
H02J 7/02 (2016.01)

(52) **U.S. Cl.**
CPC **H02J 7/025** (2013.01)

34 Claims, 24 Drawing Sheets



US 9,608,472 B2

Page 2

(56)

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 Portions of prosecution history of U.S. Appl. No. 13/421,476, Oct. 14, 2014, Moshfeghi, Mehran.
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 Wells, Jonathan, "Multigigabit wireless technology at 70 GHz, 80 GHz and 90 GHz," May 2006, 5 pages.
 Updated portions of prosecution history of U.S. Appl. No. 13/421,500, Jun. 3, 2015, Moshfeghi, Mehran.
 Updated portions of prosecution history of U.S. Appl. No. 13/421,476, Apr. 29, 2015, Moshfeghi, Mehran.

* cited by examiner

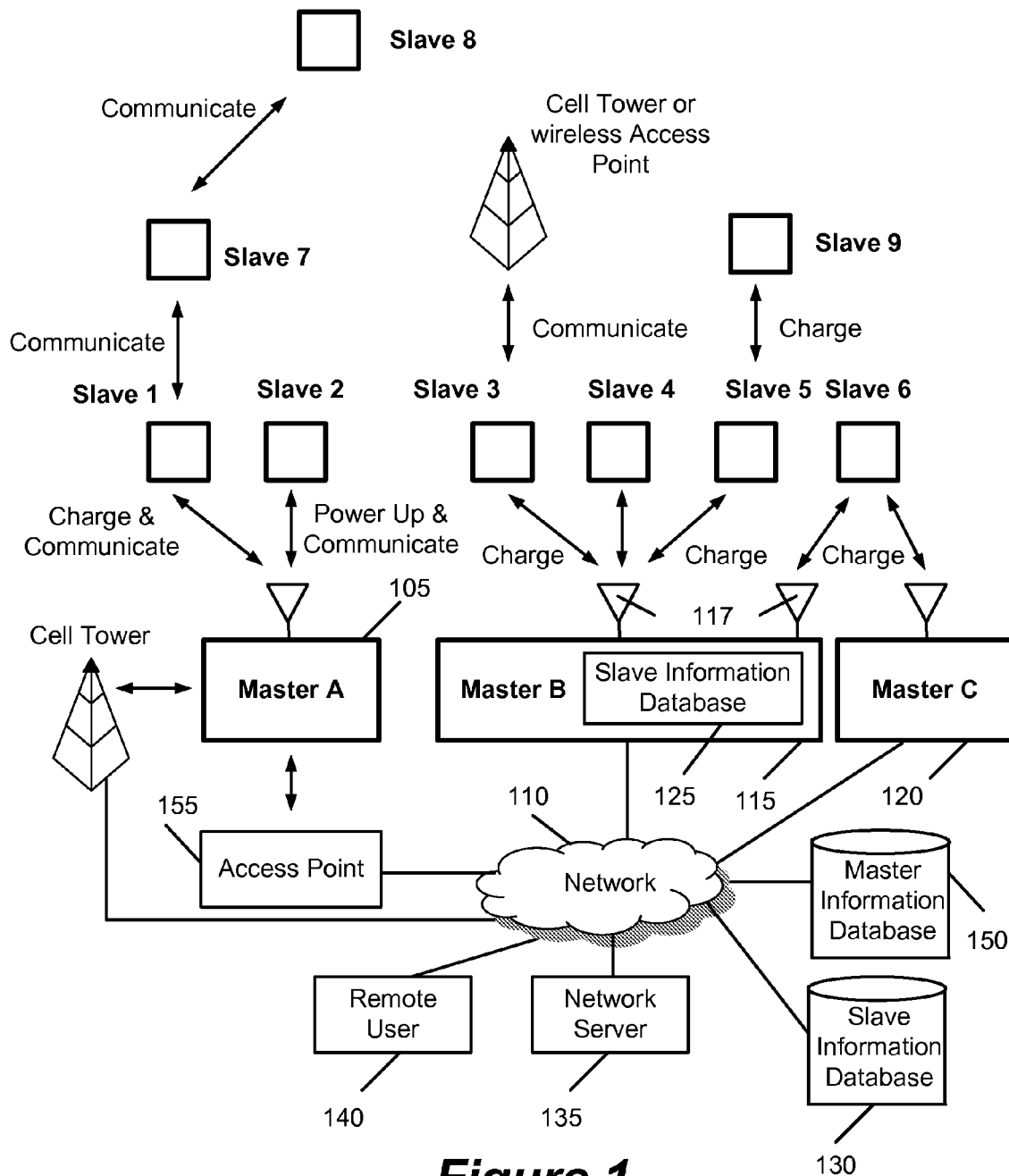


Figure 1

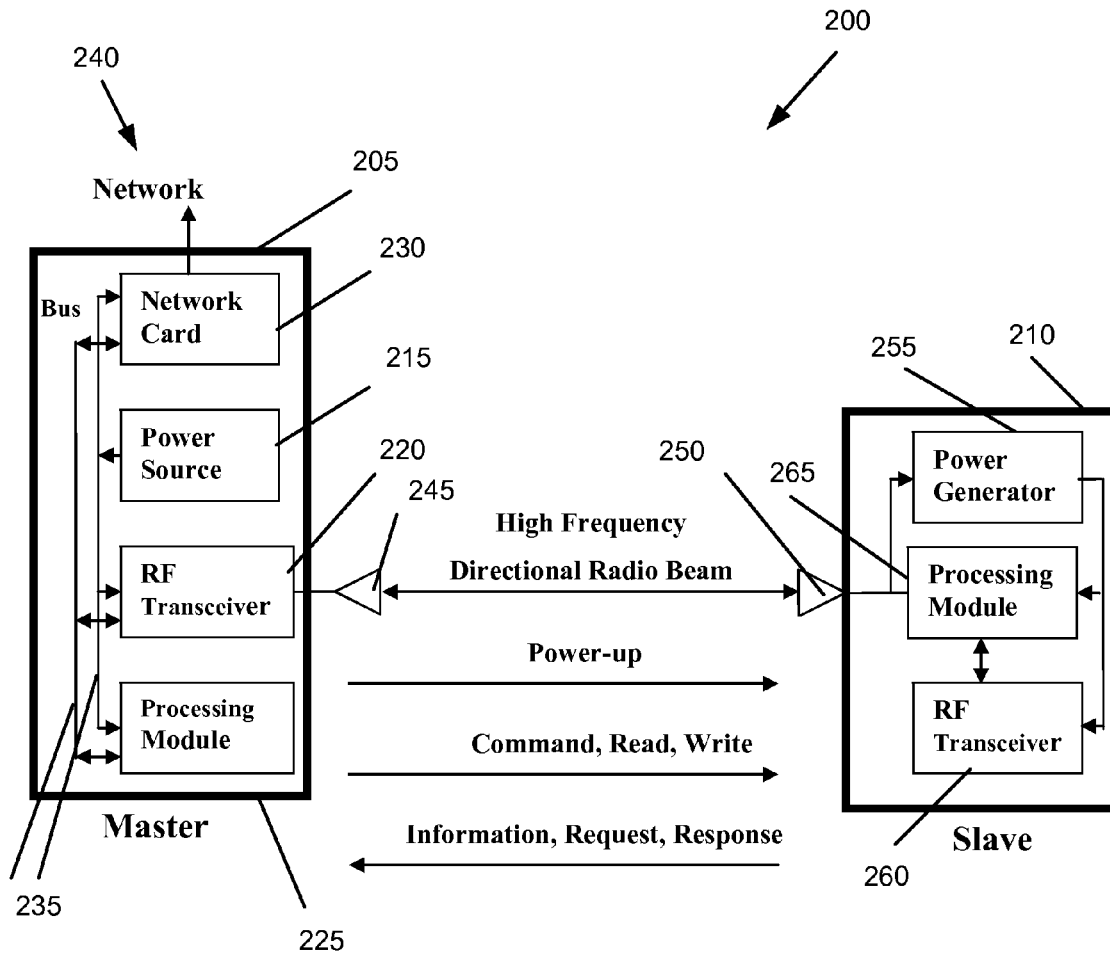


Figure 2

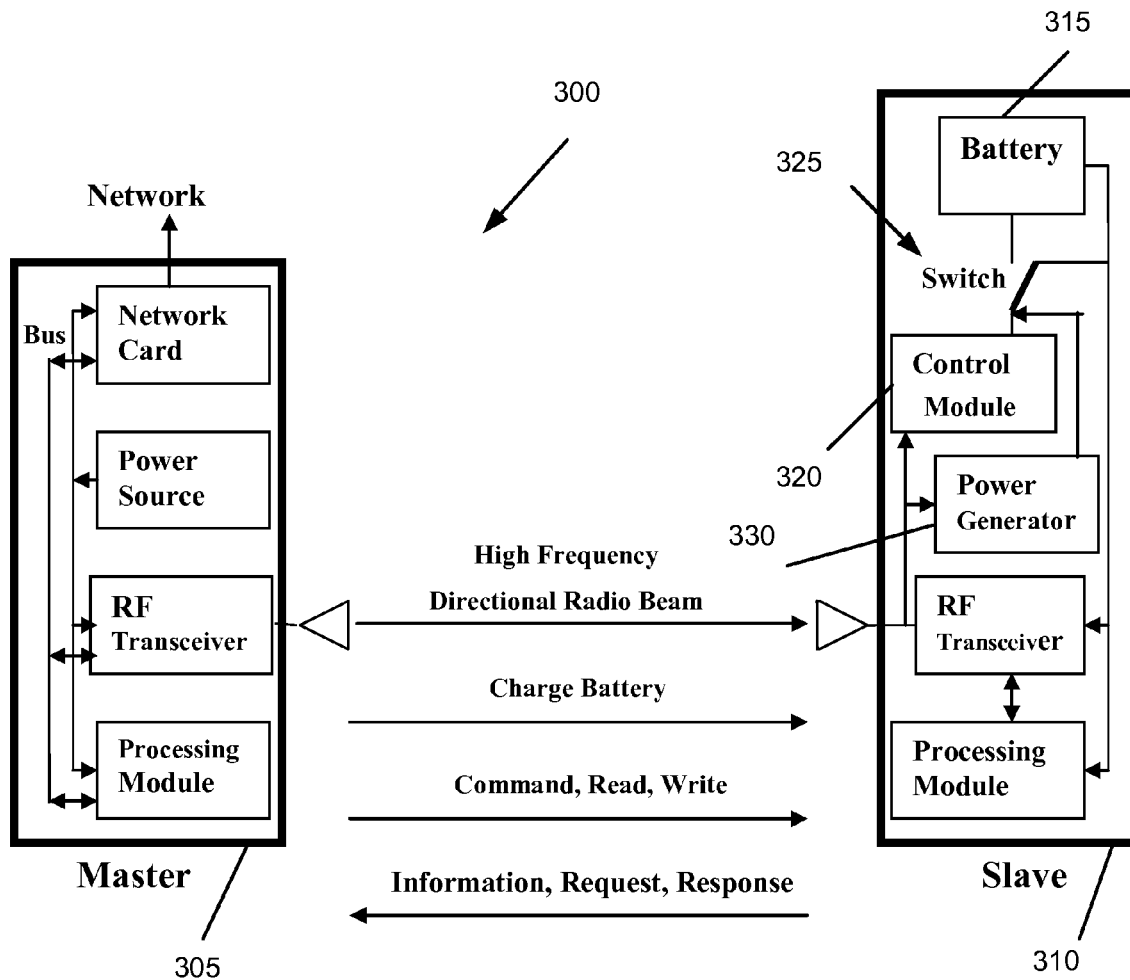
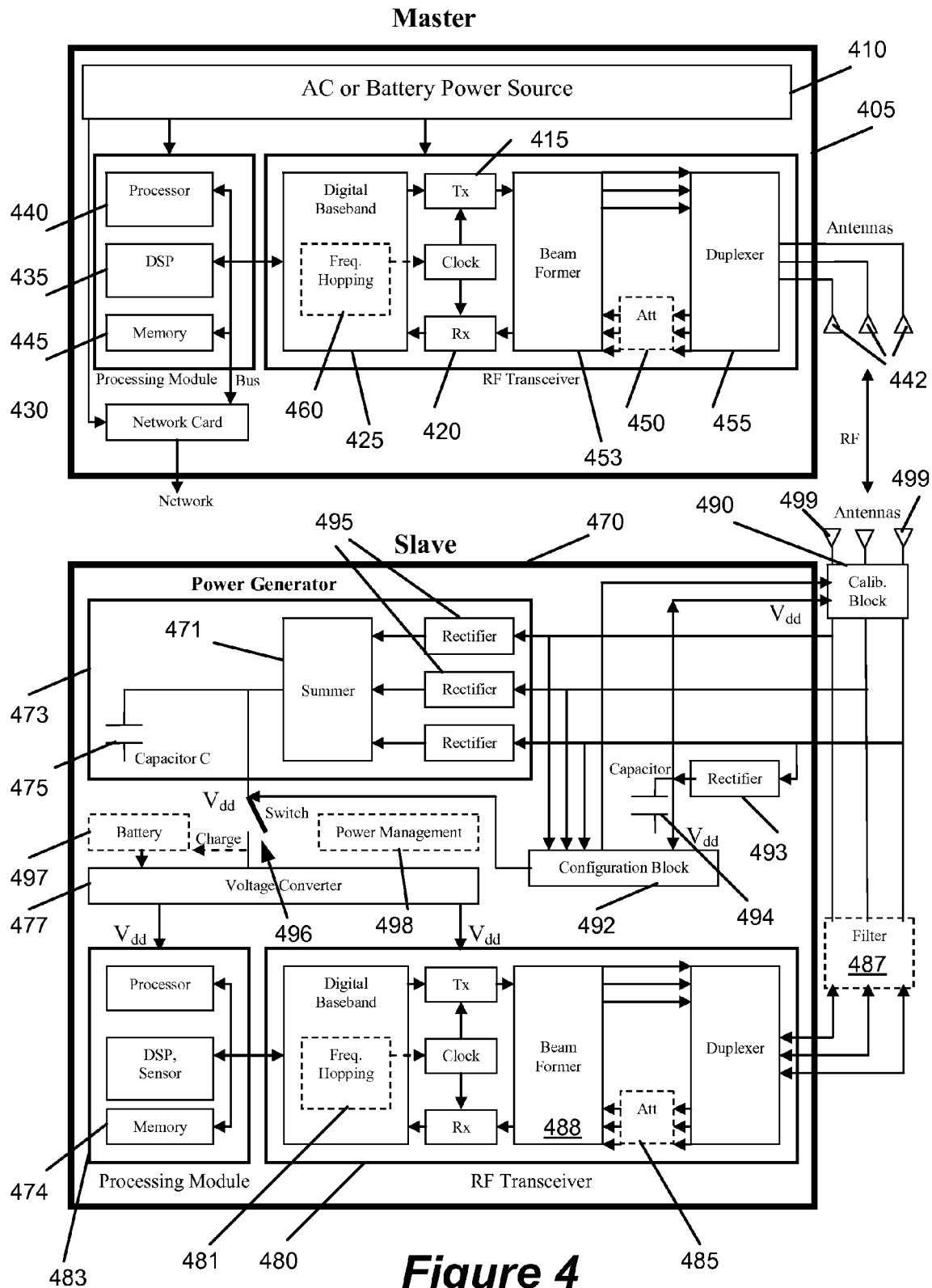


Figure 3



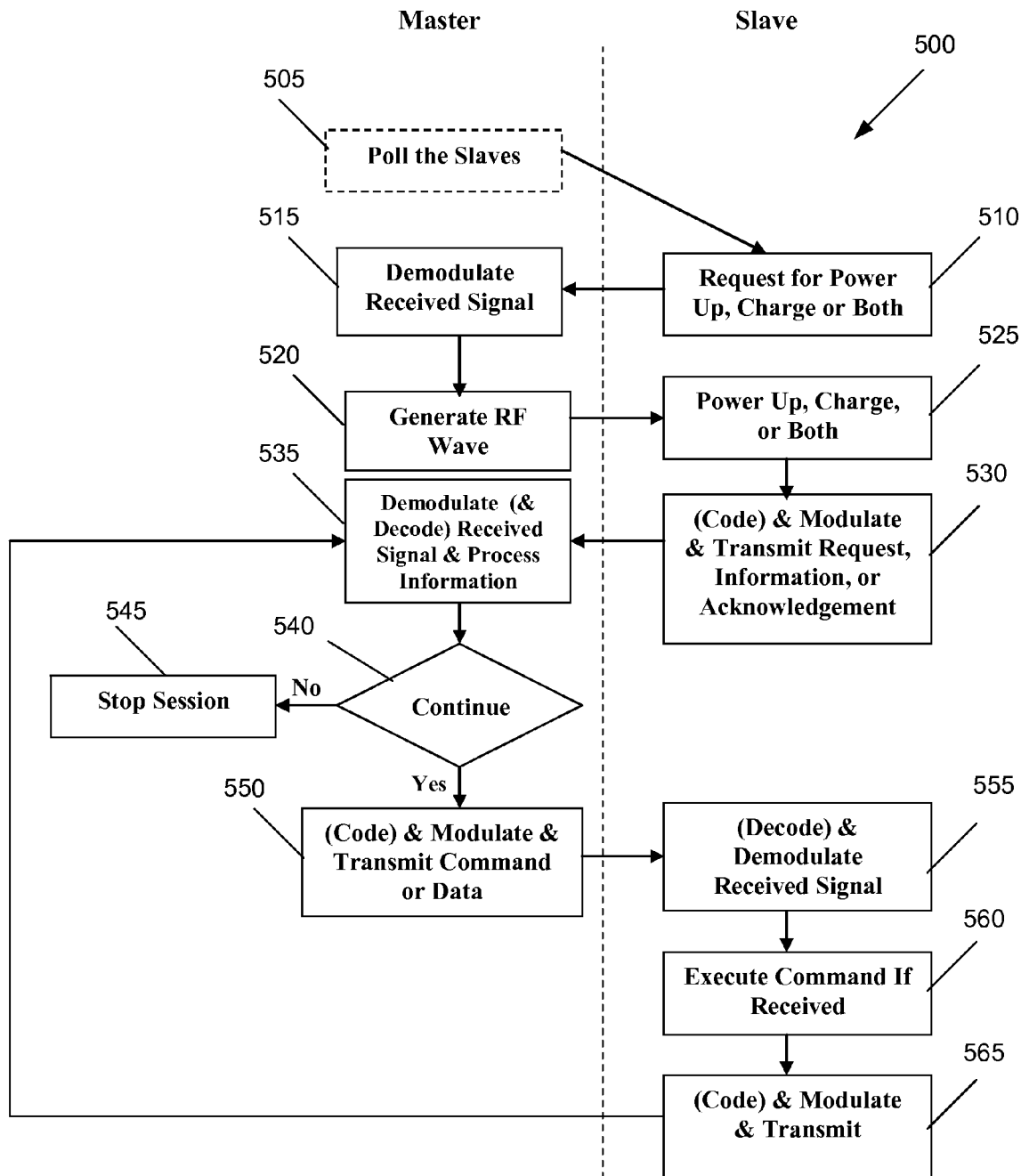


Figure 5

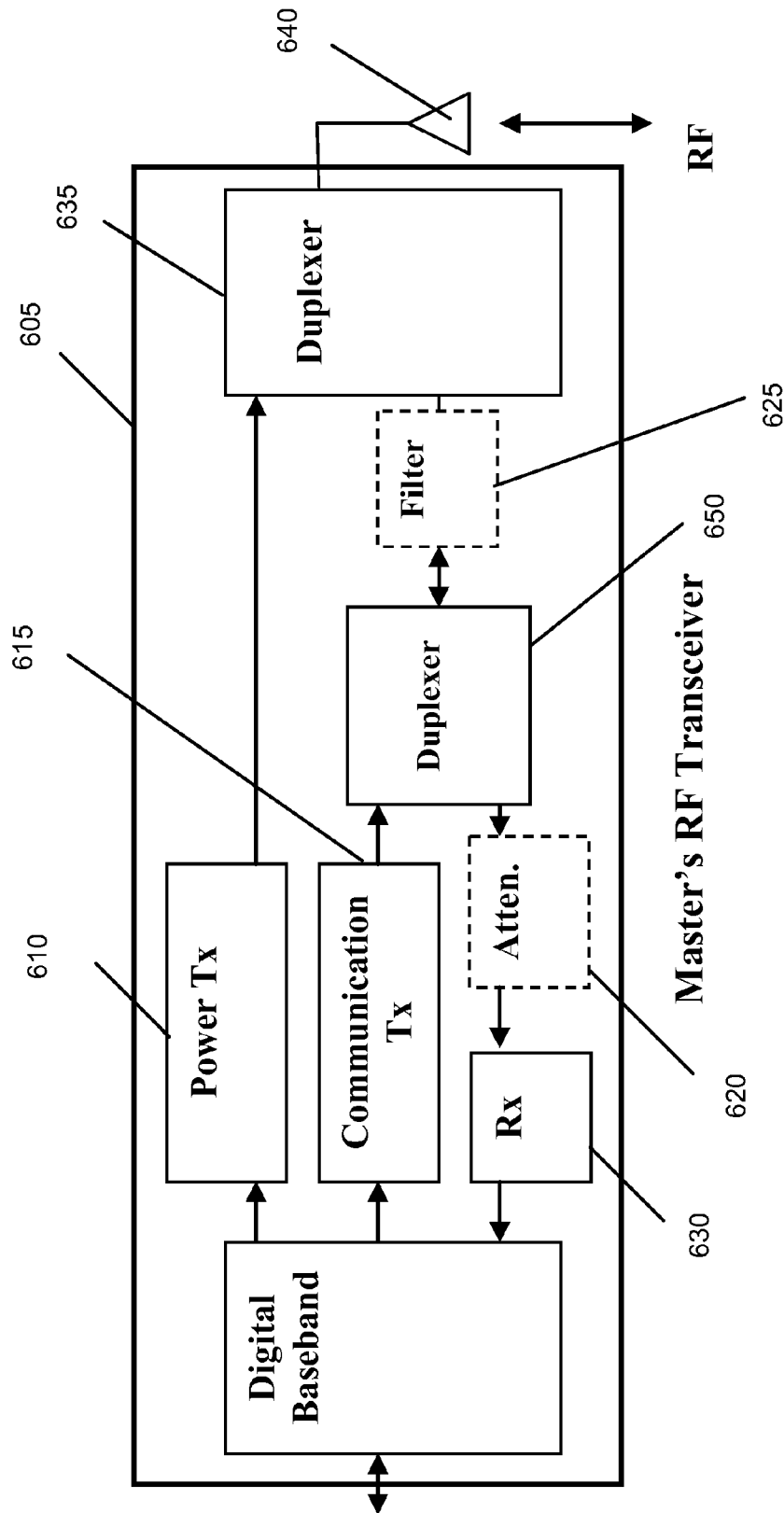


Figure 6

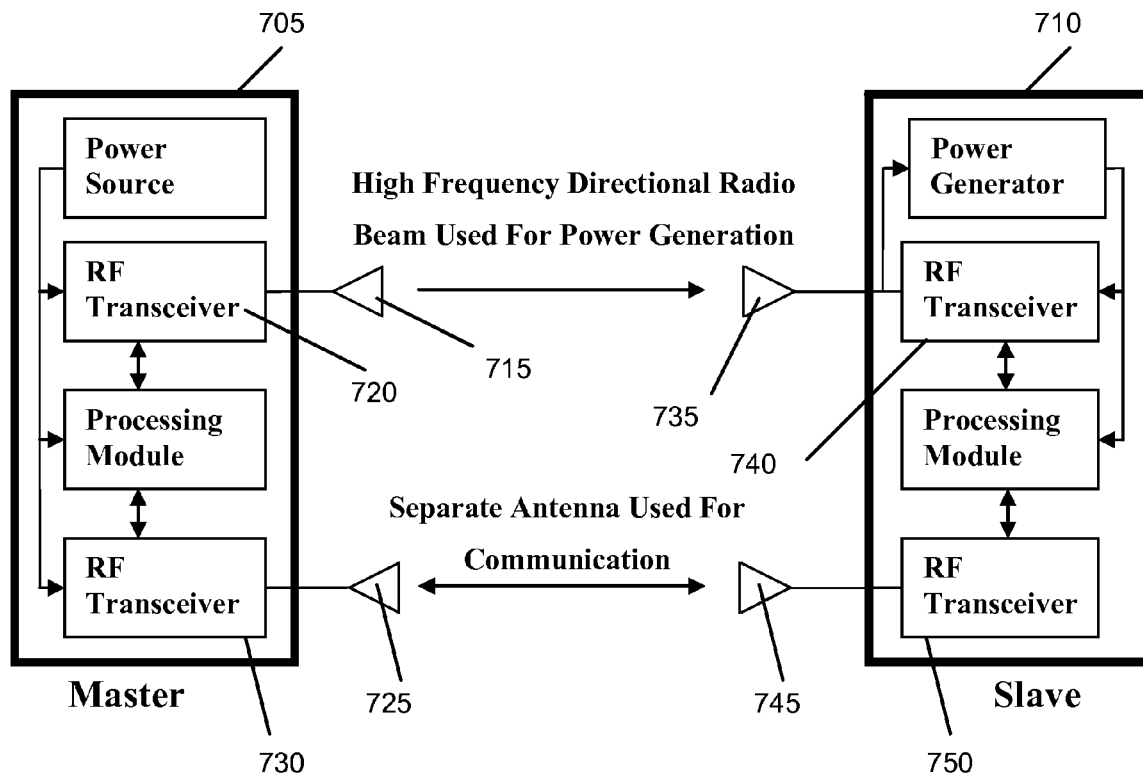


Figure 7



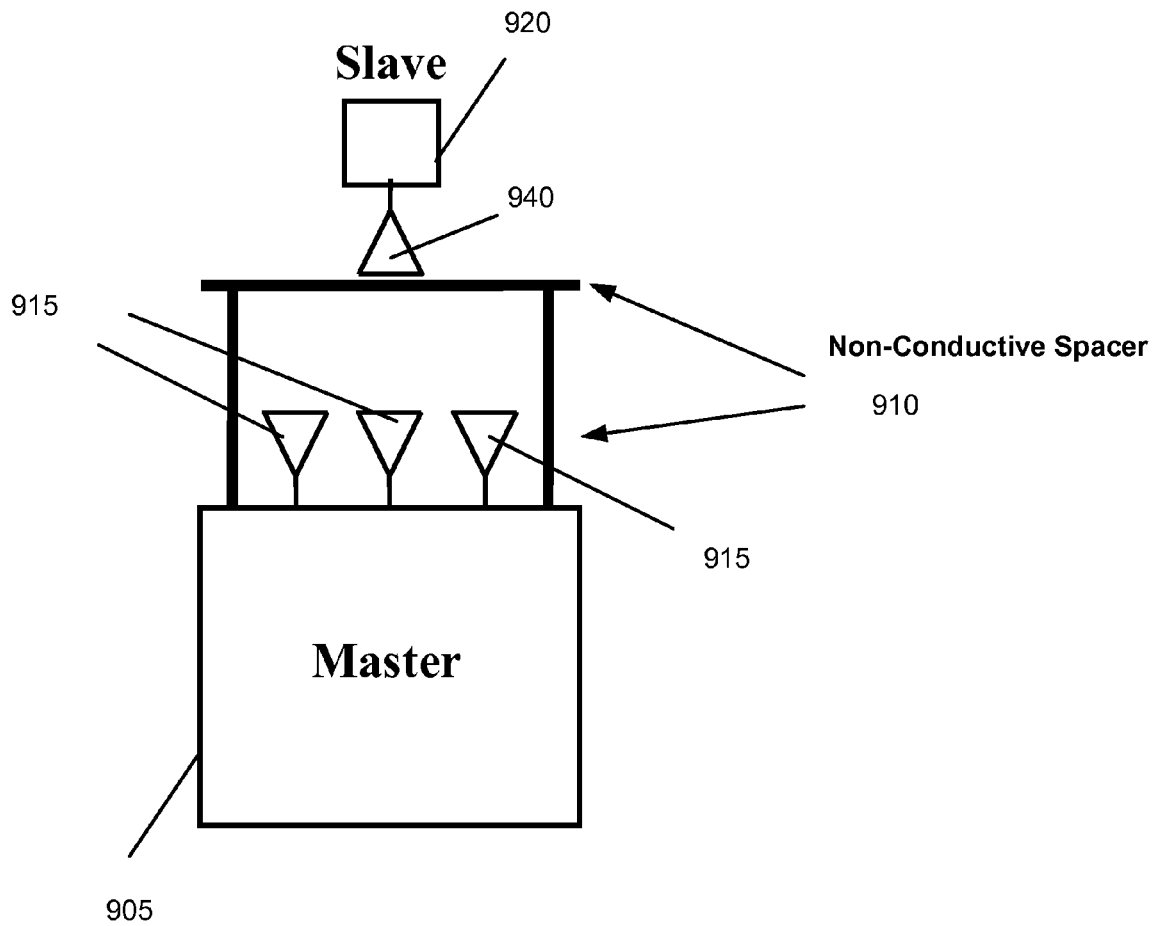
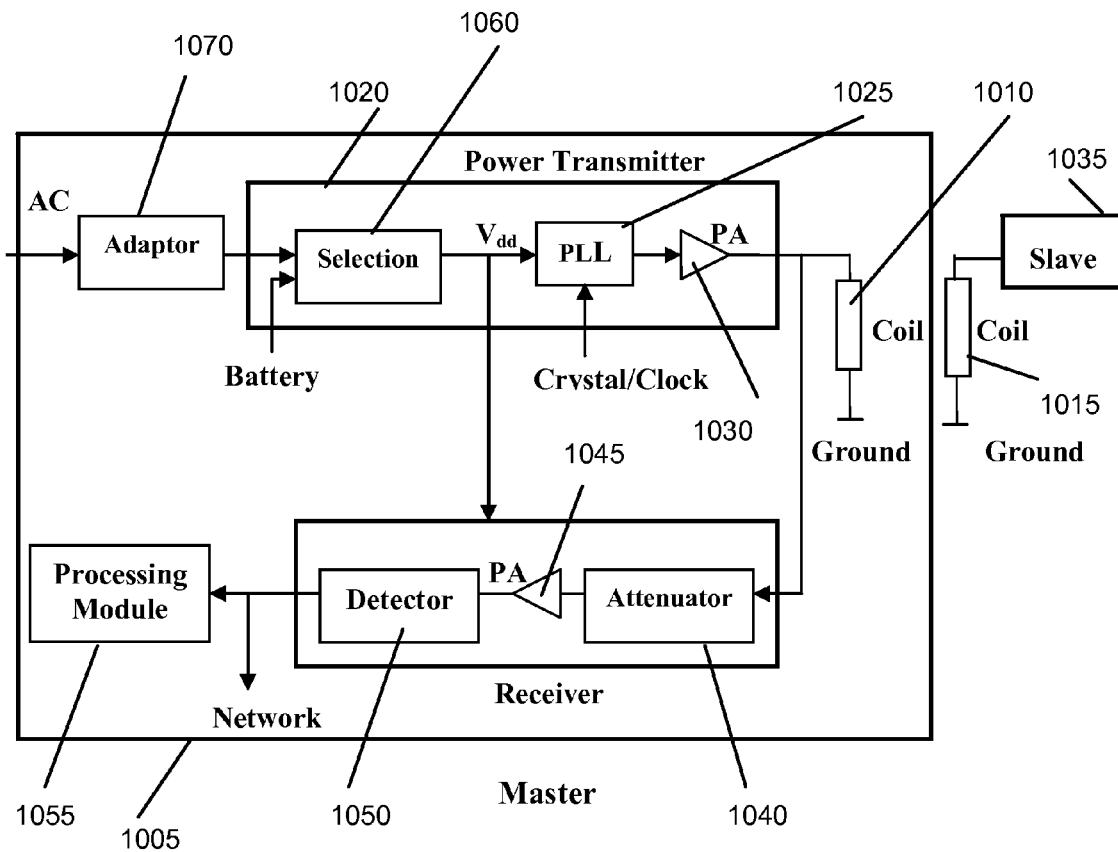
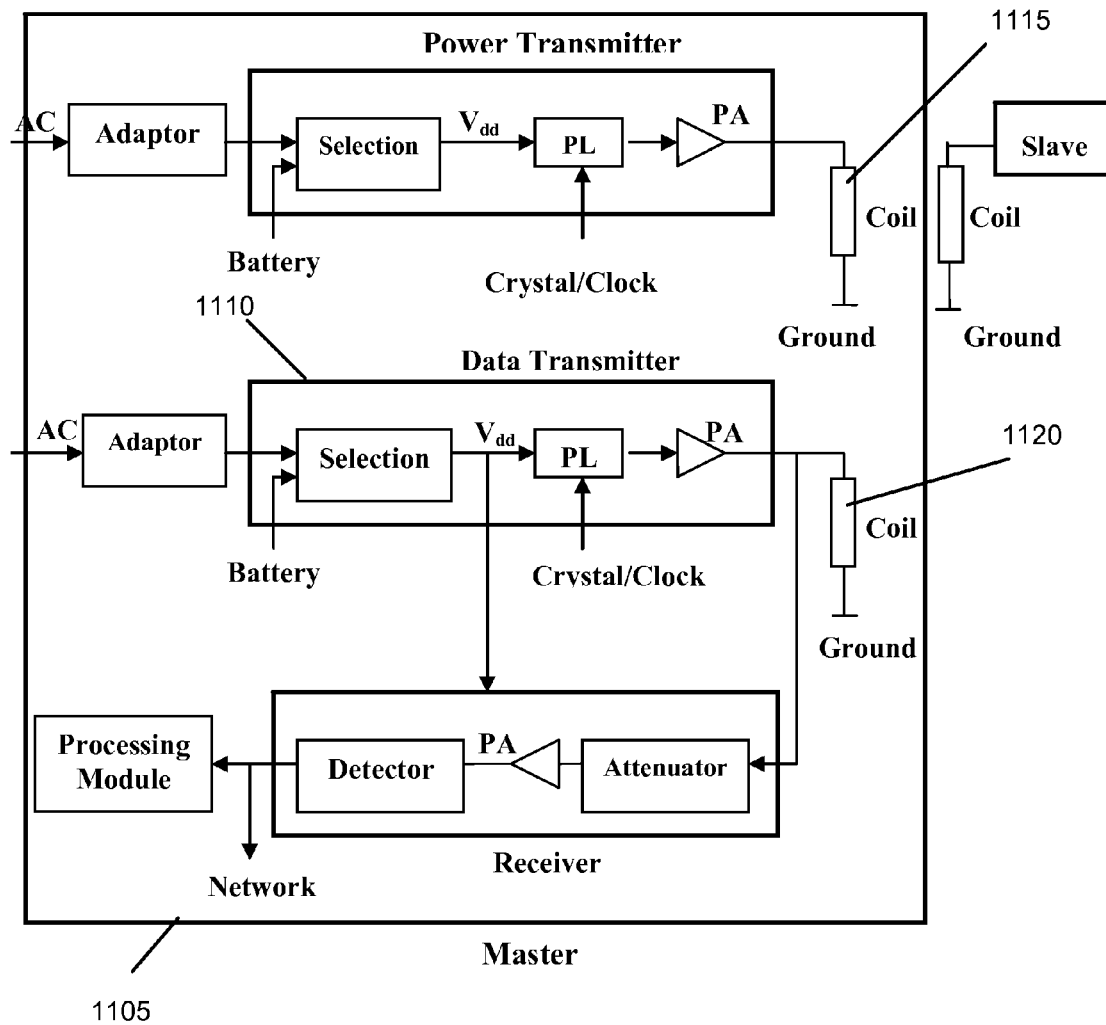


Figure 9

**Figure 10**

**Figure 11**

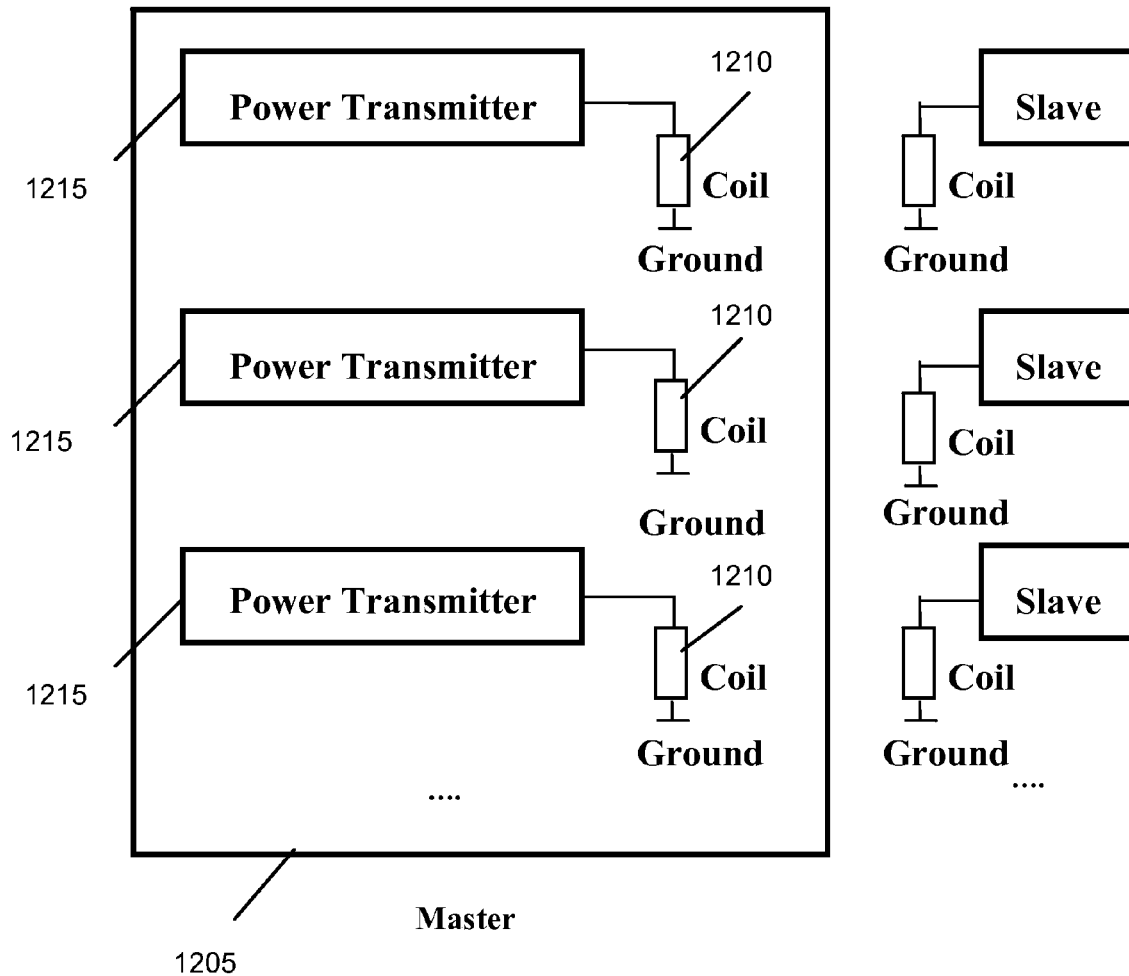


Figure 12

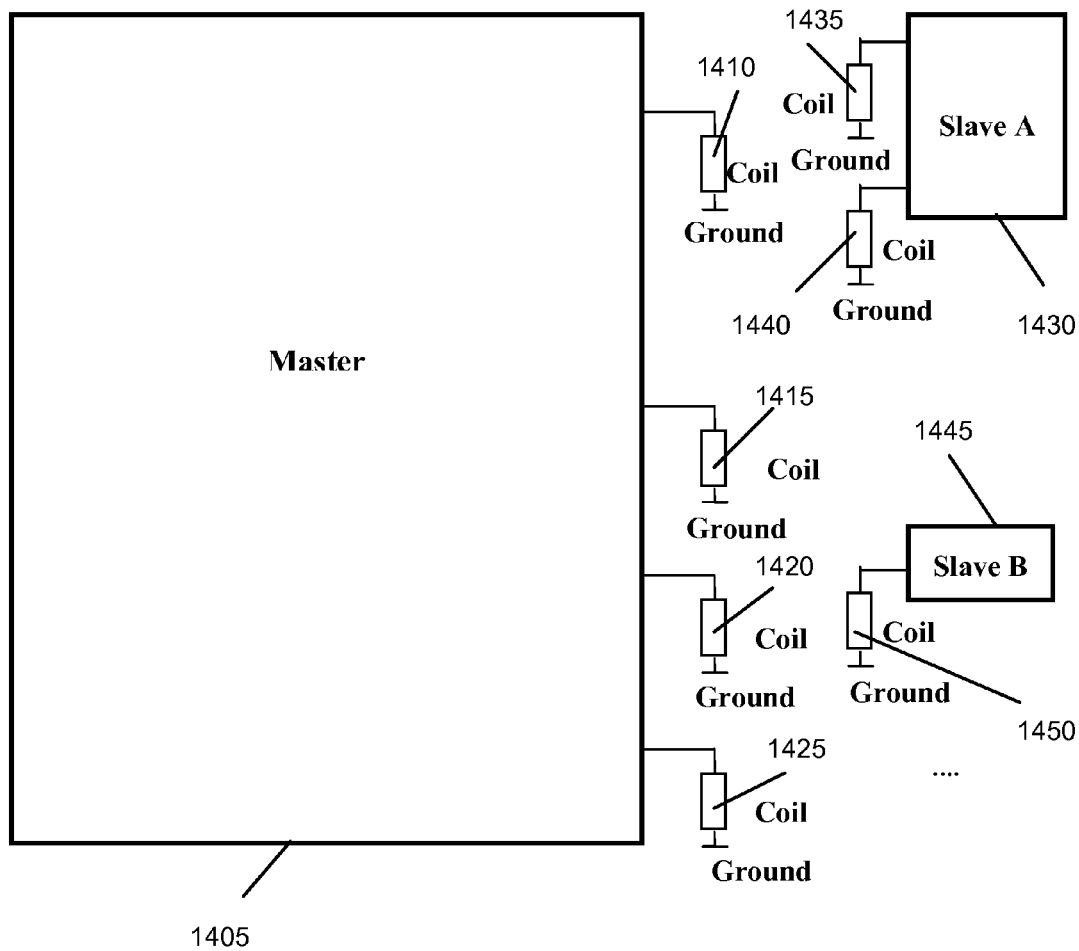
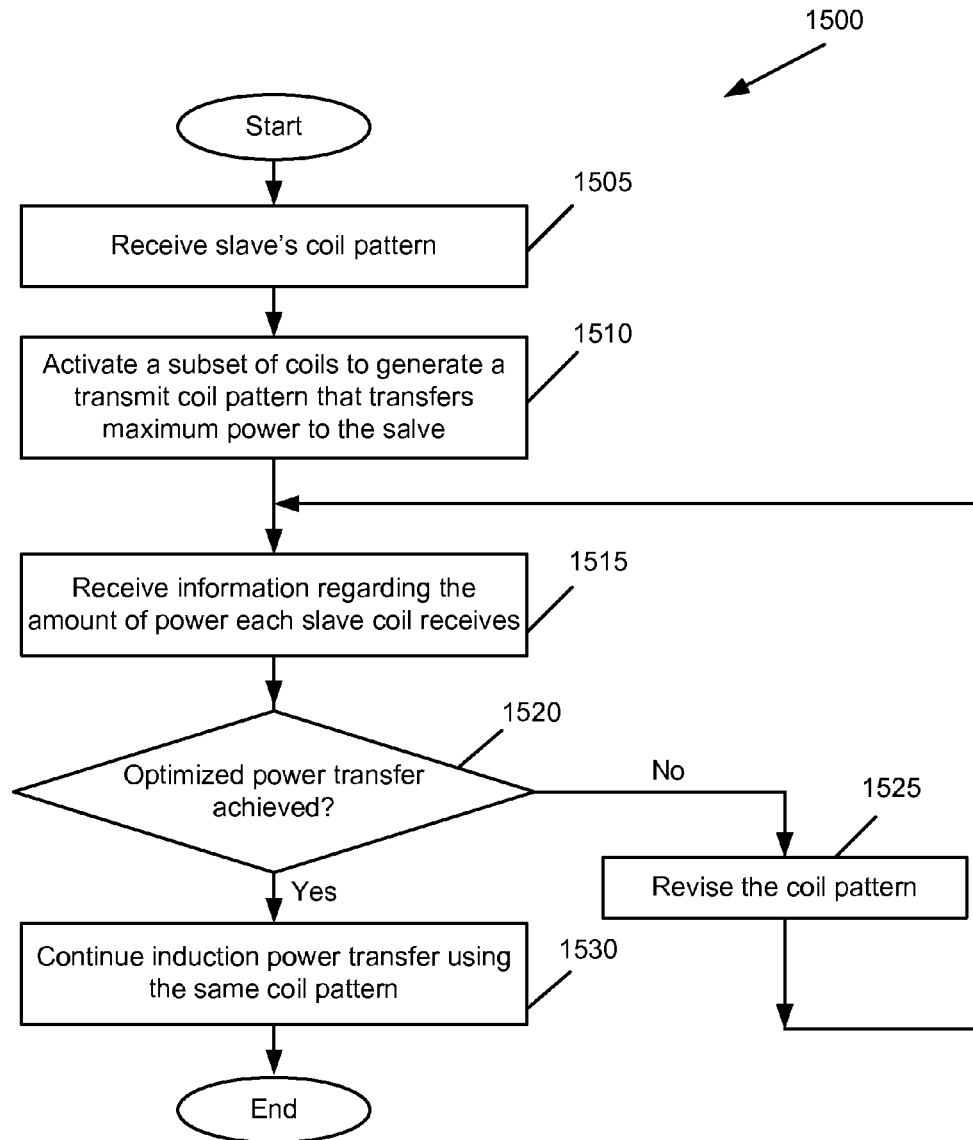
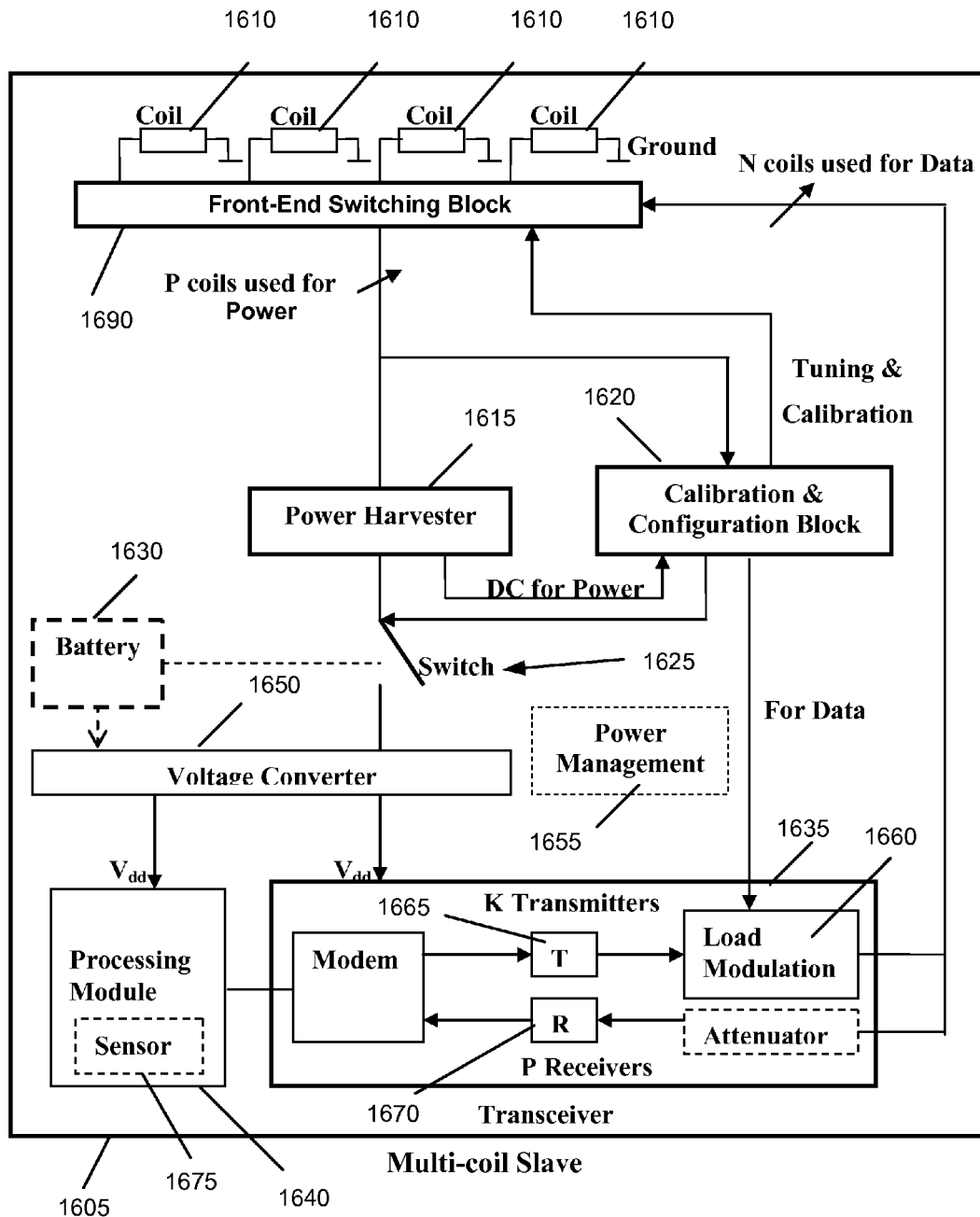
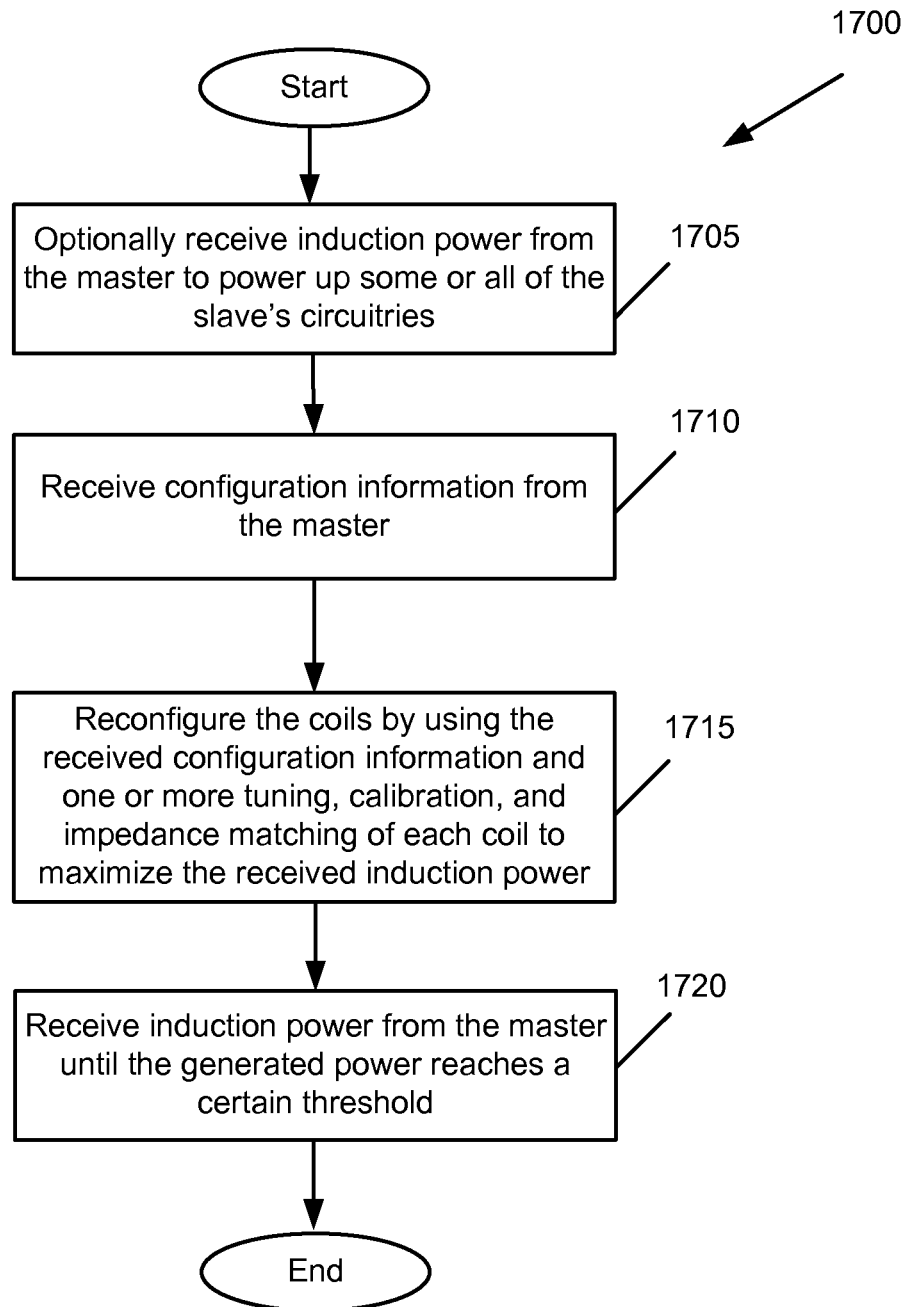
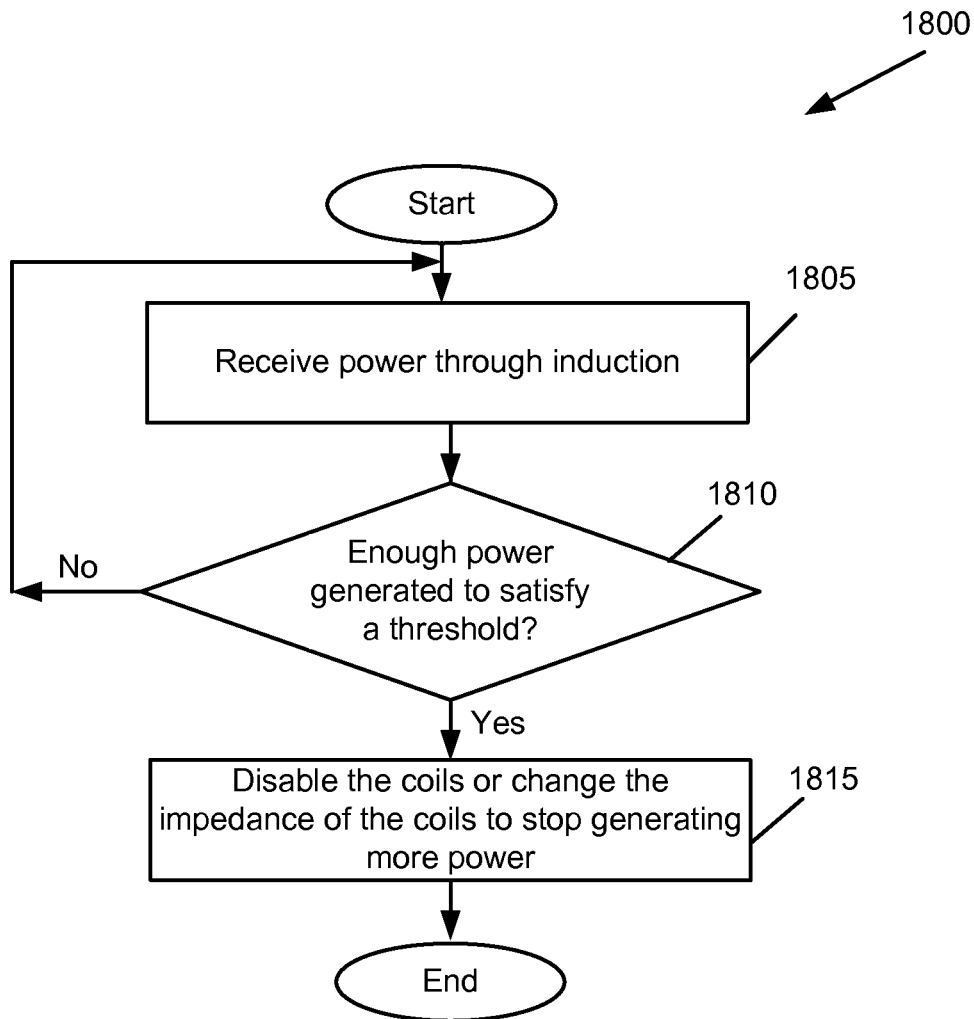


Figure 14

**Figure 15**

**Figure 16**

**Figure 17**

**Figure 18**

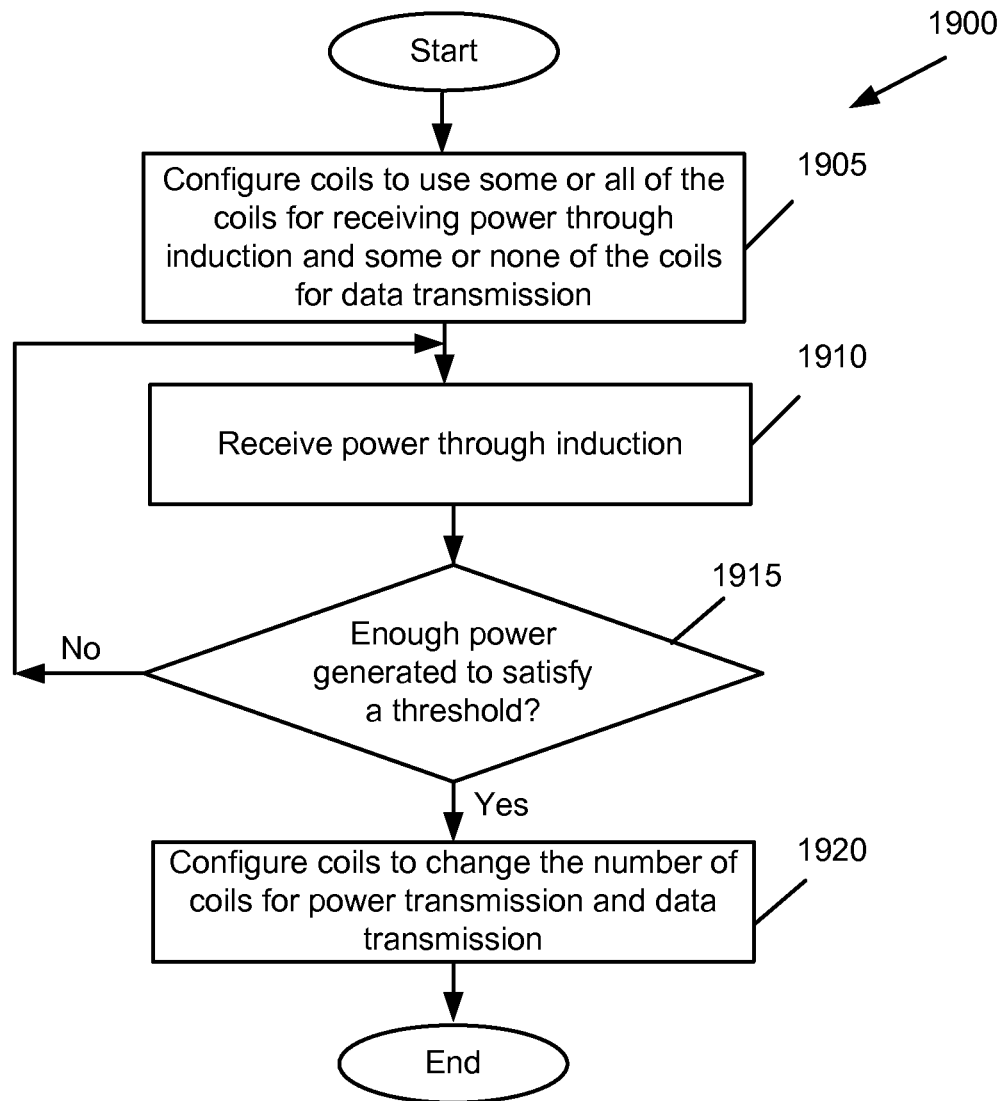
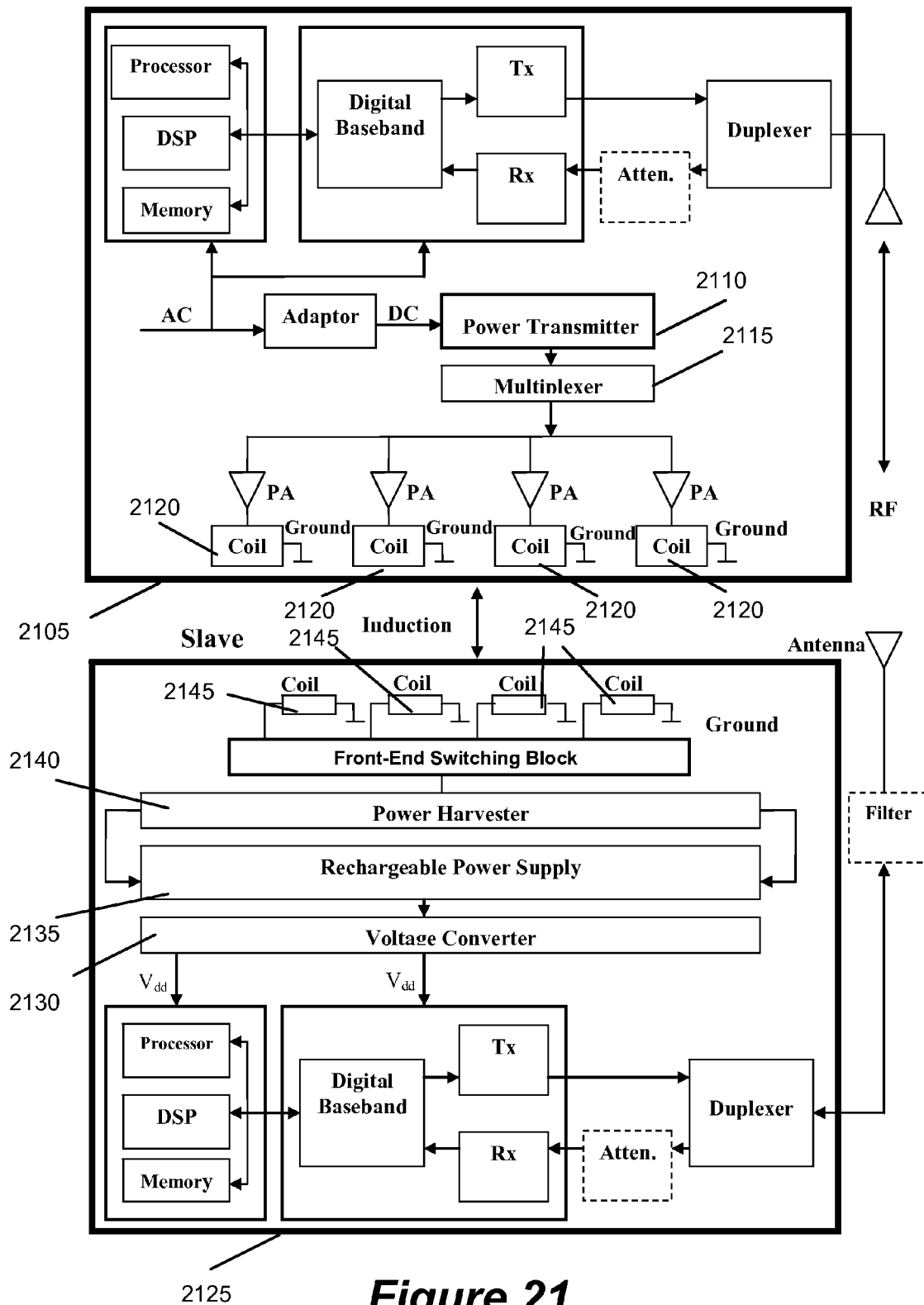
**Figure 19**

Figure 20

**Figure 21**

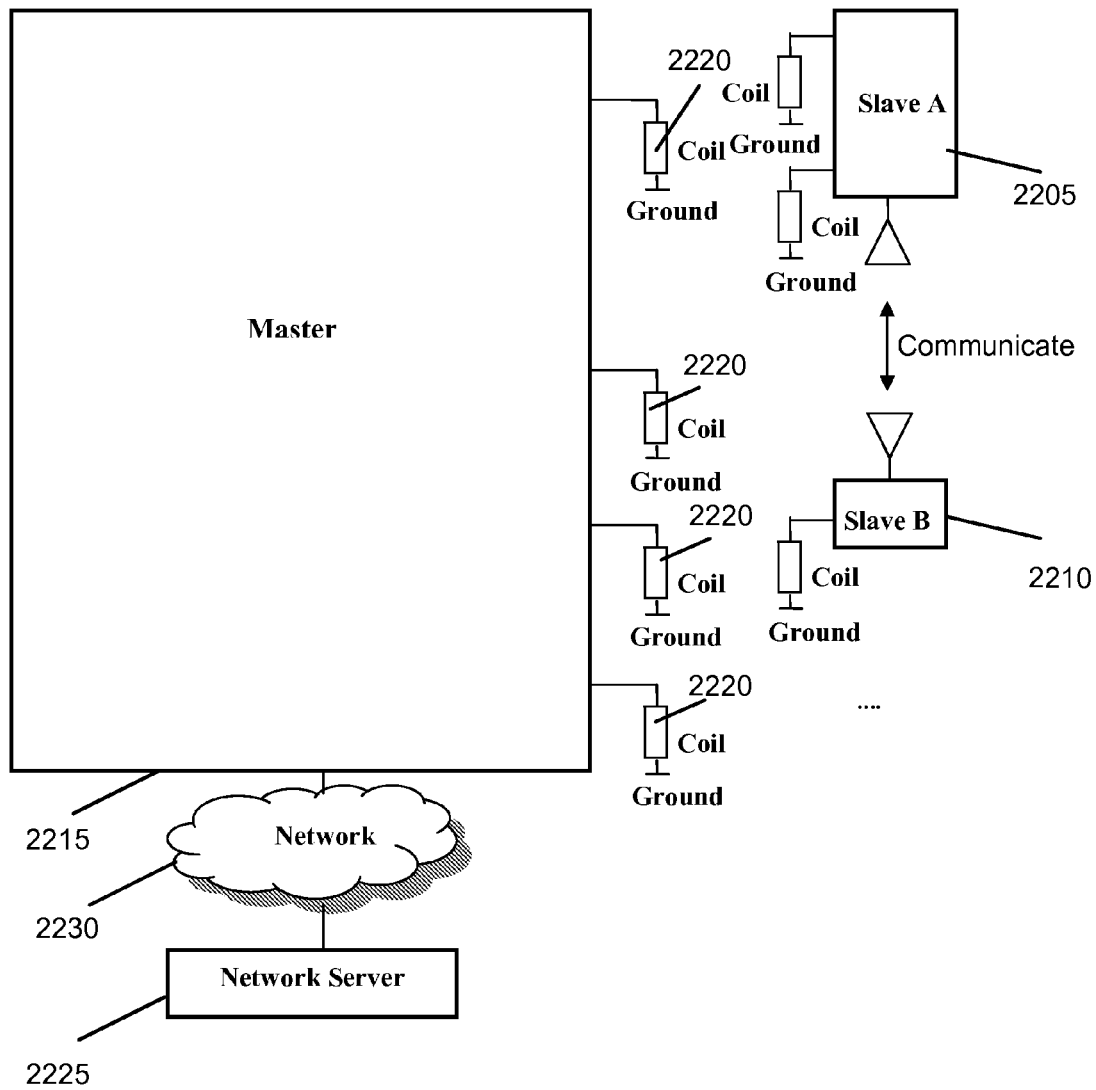


Figure 22

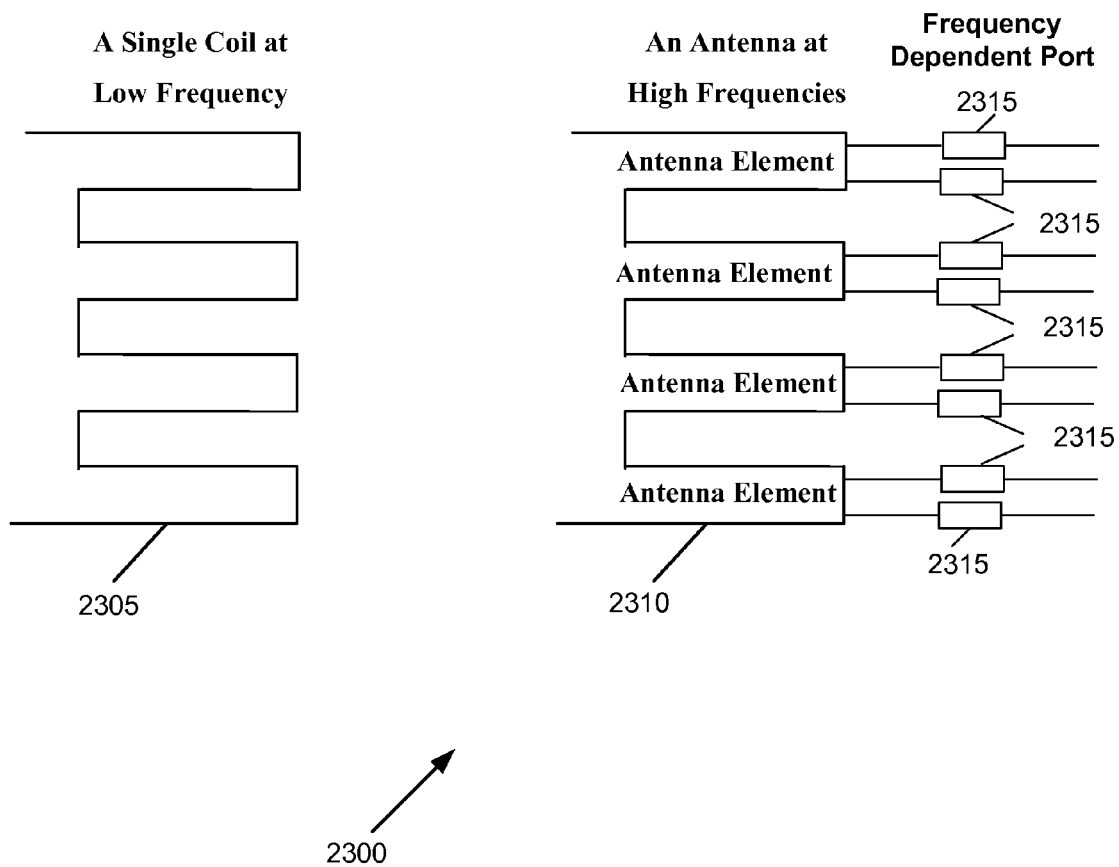


Figure 23

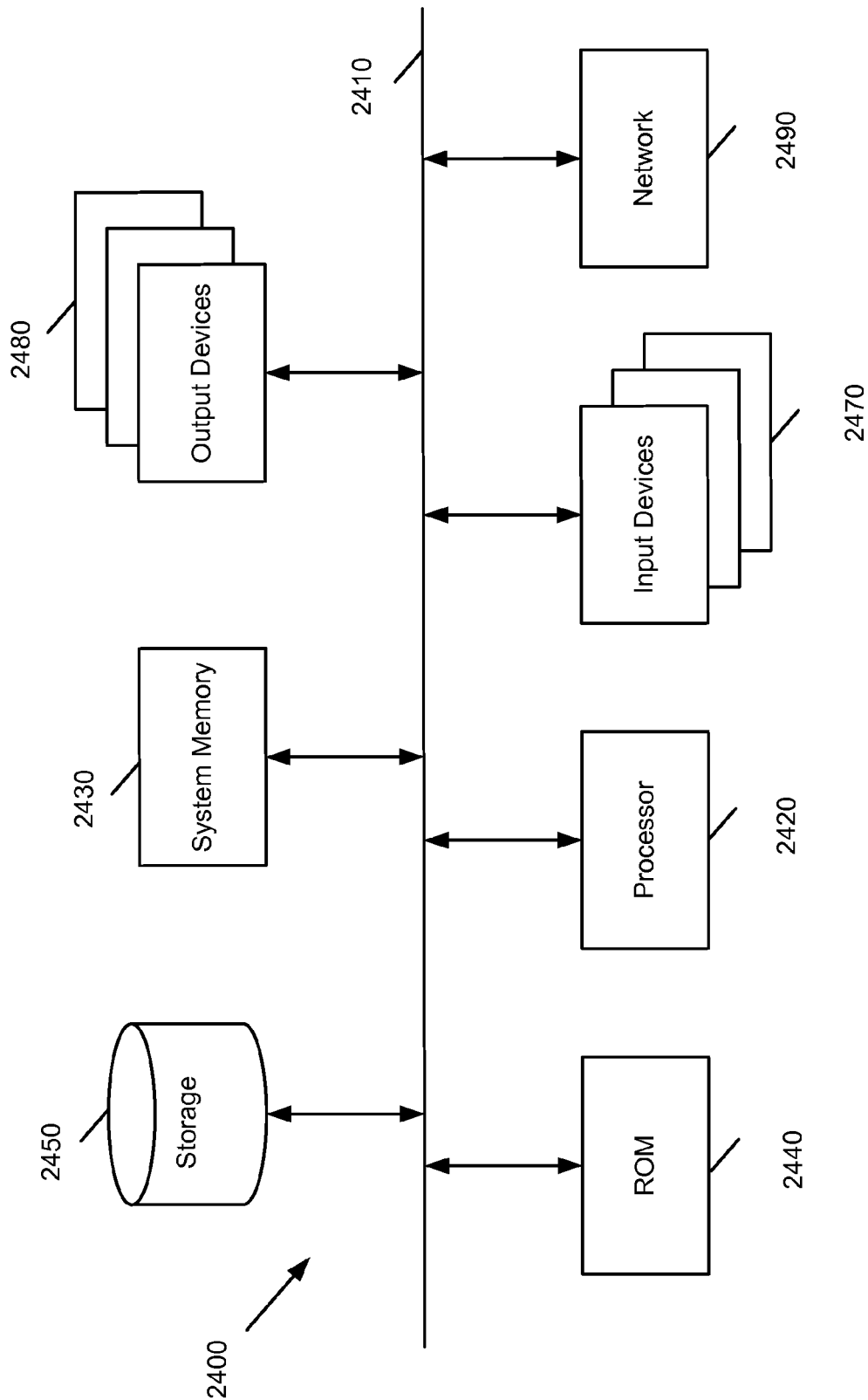


Figure 24

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METHOD AND APPARATUS FOR WIRELESSLY TRANSFERRING POWER AND COMMUNICATING WITH ONE OR MORE SLAVE DEVICES

CLAIM OF BENEFIT TO RELATED APPLICATIONS

The present Application is a continuation application of U.S. patent application Ser. No. 12/979,254, entitled "Method and apparatus for wirelessly transferring power and communicating with one or more slave devices," filed Dec. 27, 2010, published as U.S. Patent Publication 2011-0156640. U.S. patent application Ser. No. 12/979,254 claims the benefit of U.S. Provisional Patent Application 61/290,184, entitled, "Master Device that Wirelessly Transfers Power and Communicates with a Plurality of Slave Devices," filed Dec. 25, 2009. The contents of U.S. Provisional application 61/290,184 and U.S. patent application Ser. No. 12/979,254, published as U.S. Patent Publication 2011-0156640 are hereby incorporated by reference.

BACKGROUND

Induction is a common form for wireless power. Non resonant induction systems like transformers use a primary coil to generate a magnetic field. A secondary coil is then placed in that magnetic field and a current is induced in the secondary coil. Induction, however, has the disadvantage that the receiver must be very close to the transmitter in order to inductively couple to it. At large distances induction wastes most of the energy in the resistive losses of the primary coil. Resonant inductive coupling improves energy transfer efficiency at larger distances by using two coils that are highly resonant at the same frequency. However, both non-resonant and resonant induction wireless power methods are non-directive and irradiate the space around them. This can be disadvantage in some situations since there are regulations that limit human exposure to alternating magnetic fields because of concern for biological impacts on the users. Also, since they use low frequencies (KHz to 7 MHz) they cannot be used for high speed communication.

BRIEF SUMMARY

The preceding Summary is intended to serve as a brief introduction to some embodiments of the invention. It is not meant to be an introduction or overview of all inventive subject matter disclosed in this document. The Detailed Description that follows and the Drawings that are referred to in the Detailed Description will further describe the embodiments described in the Summary as well as other embodiments. Accordingly, to understand all the embodiments described by this document, a full review of the Summary, Detailed Description and the Drawings is needed. Moreover, the claimed subject matters are not to be limited by the illustrative details in the Summary, Detailed Description and the Drawing, but rather are to be defined by the appended claims, because the claimed subject matters can be embodied in other specific forms without departing from the spirit of the subject matters.

Some embodiments provide a wireless transmitter that uses radio frequencies (RF) with small high gain directive antennas and high frequency radio waves or electromagnetic induction to charge one or more receiving devices and then communicate with them. Wireless communication is convenient because it allows devices to connect to each other

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without wires. Wireless power is convenient because it removes the need for wires and connectors. This invention combines these two aspects together.

Some embodiments use radio frequency (RF) instead of resonant electromagnetic induction to charge and communicate with slave devices. Throughout this specification the 60 GHz spectrum is used for describing the RF charging aspect of this invention. However, 60 GHz is only one special case of using higher frequencies for implementing this invention. In the U.S. the 60 GHz spectrum band can be used for unlicensed short range data links (1.7 km) with data throughputs up to 2.5 Gbits/s. Higher frequencies such as the 60 GHz spectrum experience strong free space attenuation. The smaller wavelength of such high frequencies also enables the use of small high gain antennas with small beam widths. The combination of high attenuation and high directive antenna beams provides better frequency reuse so that the spectrum can be used more efficiently for point-to-multipoint communications. For example, a larger number of directive antennas and users can be present in a given area without interfering with one another, compared to less directive antennas at lower frequencies. Small beam width directive antennas also confine the electromagnetic waves to a smaller space and therefore limit human exposure. The higher frequencies also provide more bandwidth and allow more information to be wirelessly transmitted. Thus, the same antenna can be used to for power generation and communication.

There are several standards bodies that are using high frequencies such as 60 GHz. These include WirelessHD, WiGig, and WiFi IEEE 802.11ad. The WirelessHD specification is based on the 7 GHz of continuous bandwidth around the 60 GHz radio frequency and allows for digital transmission of uncompressed high definition (HD) video, audio and data. It is aimed at consumer electronics applications and provides a digital wireless interface for file transfers, wireless display and docking, and lossless HD media streaming for ranges up to 10 meters. Theoretically it can support data rates as high as 25 Gbit/s. The 60 GHz band usually requires line of sight between transmitter and receiver because of high absorption. The WirelessHD specification gets around this limitation by using beam forming at the transmitter and receiver antennas to increase effective power of the signal.

The WiGig standard (short for the "Wireless Gigabit Alliance") is also promoting high speed wireless communication over the unlicensed 60 GHz spectrum and is a competing standard to WirelessHD. The WiGig standard is also taking advantage of the high absorption of 60 GHz that limits signal propagation and reduces interference with other wireless systems.

IEEE 802.11ad is also under development by the IEEE task group for the upcoming 60 GHz standard. This is essentially a faster version of the IEEE 802.11 standard that uses the 60 GHz band. However, because it uses a new spectrum it will not be backward compatible with existing WiFi.

Wireless USB is a standard which does not use 60 GHz. Wireless USB uses the Ultra-wideBand (UWB) radio platform that operates in the 3.1 to 10.6 GHz frequency and can transmit 480 Mbit/s at distances up to 3 meters and 110 Mbit/s at up to 10 meters. While the goal of 802.11 family (802.11*) WiFi is to replace Ethernet cables and provide wireless Internet access, the goal of Wireless USB is to remove the cables from USB based PC peripherals. Wireless USB can be used for printers, scanners, digital cameras, MP3 players, game controllers, hard disks, and flash drives.

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Both WirelessHD and WiGig are competing in some aspects with the Wireless USB standard. Inductive Charging in some embodiments is performed at lower frequencies such as frequencies of less than 100 MHz, whereas RF frequencies used in some embodiments is greater than 900 MHz or 1 GHz. The higher the RF frequencies, the smaller the wavelength and hence the smaller the size of the antenna.

None of the above standards address charging slave devices before communicating with them. Instead they assume that the slaves have access to some power source such as AC power or a battery. In some embodiments a master device uses one or more directional antennas or uses antenna array beam forming to transmit high frequency RF signals to one or more slave devices to power them up or charge their batteries. By using the directional antennas or using antenna array beam forming, these embodiments concentrate the power on a smaller area.

Some embodiments provide a networked system with a master device that can power-up or charge a plurality of slave devices and communicate with them. In some embodiments the master is connected to other network devices and/or Intranet/Internet though packet-based or non packet based networks and wired or wireless networks (such as Bluetooth®, Wireless Local Area Network (WLAN), fourth generation (4G) cellular, Code Division Multiple Access (CDMA), Time Division Multiple Access (TDMA), Worldwide Interoperability for Microwave Access (WiMAX), UWB and 60 GHz). The master in some embodiments monitors the power status of a plurality of slaves, decides which subset of those slaves get charged and what their charging priorities are. The slaves in some embodiments have different power status and capabilities (some have power to communicate, while others have low battery, and yet others have no battery).

In some embodiments, the slave has sensors (e.g. temperature, gyration, pressure, and heart monitor) with electronic circuitry that are powered up by the master, perform their sensing functions and communicate their data to the master, a network server, or some other device. The channel for power transfer in some embodiments is RF or electromagnetic induction. A control channel is used in some embodiments by the master to send commands to the slaves. Some embodiments use the same channel for power, control, and communication. One, two or all of the power, control, and communication in some embodiments use different channels (e.g. different frequencies, different radios, different antenna, and different coils for induction) or different methods (RF Beam and induction).

In some embodiments, the master configures the system to increase power and communication efficiency (e.g. uses several antenna and beam steering for RF, or several coils and coil pattern optimization for induction). In some embodiments the master and the slave have a matrix of coils (for induction) and the master changes its transmit coil pattern in order to optimize power transfer to the slave. Several masters in some embodiments cooperate or are configured by a network server or remote user to use beam steering and different antennas to charge a plurality of slaves. In some embodiments the slaves provide their identifying information and register themselves in a slave information database. In some embodiments the masters provide their identifying information and register themselves in a master information database. The master in some embodiments receives a slave's identifying information (MAC ID, network Internet protocol (IP) address, name, serial number, product name and manufacturer, capabilities, etc.) by communicating with the slave or by examining the slave infor-

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mation database to select which slaves to power up, charge, or communicate with. A slave in some embodiments prevents non-authorized masters (or networked servers) from trying to charge it or power it up by checking the master's identifying information with the authorized master's list stored on the slave. The master's selection and power scheduling of slaves is dependent on the priorities of slaves' functions and data in some embodiments.

In some embodiments, the master uses frequency hopping and time hopping to select some slaves from a plurality of slaves. A master in some embodiments charges a slave to a pre-set high level, then communicates with it until battery falls to a pre-set low level, and then charges slave again, etc. A master in some embodiments powers-up/charges a slave's battery and communicate with the slave at the same time. In some embodiments a slave that is powered up gets connected to a network (packet-based or non packet based, wired or wireless such as Bluetooth®, WLAN, 4G cellular, CDMA, TDMA, WiMax, UWB and 60 GHz) through the master, through other nearby slaves, or directly to an access point/tower.

A master that does not have a network connection in some embodiments charges a slave and uses the slave's network connection to connect to the network and perform networked operations such as downloading software and driver upgrades. In some embodiments a slave that is powered up and charged becomes a master charger for other slaves.

The master and the slave optionally have a touch screen and/or keyboard for entering data which can be displayed on the screen and/or communicated, respectively, to the slave and the master in some embodiments. A network server that is connected to the master is effectively the real master in some embodiments and instructs the master, monitors the power status of a plurality of slaves, decides which subset of those slaves are powered up/charged/communicate with, and what their priorities are. Also, an authorized remote user in some embodiments uses the network to connect to the network server and control the network server, which in turn instructs the masters to monitor the power status of a plurality of slaves, decide which subset of those slaves are powered up/charged/communicate with, and what their priorities are.

A non-conductive spacer is used in some embodiments to create a separation distance of several wavelengths for RF charging and communication. Networked master chargers (both RF and induction) are in some embodiments built-in to conference room tables, office tables or lightweight pads so that meeting participants are able to wirelessly charge their devices, connect to each other or to the Intranet/Internet, transmit/receive information, and make payment transactions. Multi-coil induction masters, tables or pads in some embodiments have a credit card reader. Similarly, RF masters in some embodiments include credit card readers, so users can "sweep" their card for magnetic cards or they can read NFC-enabled cards with NFC. Therefore, users of slaves are not only able to charge their devices but also make payment transactions. For instance, phones with near field communication (NFC) capabilities in some embodiments are charged and are also used for contactless payment so that the user places the phone near those coils (or RF beams of a master in the case of RF-based master) in order to transmit payment information to a secured server on the Internet. Alternatively, credit cards in some embodiments have a chip so that they transmit their information to the master device.

Some of the coils of a multi-coil master (or RF beams of a master in the case of a multi-antenna RF-based master) in some embodiments are dedicated and optimized for com-

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munication, while others are optimized for charging. The master has different means for power, e.g., one or more of AC and adaptor, battery, induction, etc.

In some embodiments, a master uses an external induction charger to get charged, and then uses a high frequency directional and focused RF beam to power up a slave device and communicate with it. A master uses induction in some embodiments to charge a slave and uses a communication transceiver (e.g. a high frequency directional and focused RF beam) to communicate with the slave. Two or more slaves are charged by a master induction charger in some embodiments and then communicate with each other directly or through the master, possibly under the control of a remote network server.

In some embodiments an element is designed for the master, slave or both so that at low frequencies the element is like a coil inductor and at high frequencies the element is like an antenna. This means that at the same time both RF power and induction power are available. If the distance is short then waves cannot be created and it will be more like induction. So distance is used to select one mode or the mode is chosen automatically. In other embodiments, the master, slave or both to have two different elements for different distances (one for short distances and one for far distances). In some of these embodiments, the master does time multiplexing between the two or select one over the other. In some embodiments, an element is designed to be a coil at low frequencies and a multiple antenna at high frequencies with beam forming capabilities. The length of the coil is much bigger than the size of antenna required for RF at high frequencies. In some embodiments, this coil is divided into multiple RF antennas and the resulting multiple antennas is used to do beam forming.

BRIEF DESCRIPTION OF THE DRAWINGS

The novel features of the invention are set forth in the appended claims. However, for purpose of explanation, several embodiments of the invention are set forth in the following figures.

FIG. 1 conceptually illustrates an overview of the networked aspect of some embodiments of the invention.

FIG. 2 conceptually illustrates an overview of the system of some embodiments of the invention where the slave does not have a battery.

FIG. 3 conceptually illustrates an alternative system of some embodiments of the invention where the slave has a battery.

FIG. 4 illustrates a more detailed diagram of the embodiments shown in FIGS. 2 and 3.

FIG. 5 conceptually illustrates a process for master-slave charging and communication in some embodiments of the invention.

FIG. 6 conceptually illustrates a master two different transmitters for power generation and communication in some embodiments of the invention.

FIG. 7 conceptually illustrates a master and a slave that each include two separate antennas/transceivers, one for power generation and one for communication in some embodiments of the invention.

FIG. 8 conceptually illustrates a master in some embodiments of the invention that uses beam steering to change the direction of the beam when the slave is not directly in front of its beam.

FIG. 9 conceptually illustrates a multi-antenna RF master that has a non-conductive spacer material in front of its antenna in some embodiments of the invention.

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FIG. 10 conceptually illustrates a master that uses induction to charge and communicate with a slave in some embodiments of the invention.

FIG. 11 conceptually illustrates a master in some embodiments of the invention that uses the power transmitter for charging, and a separate transmitter for data transmission.

FIG. 12 conceptually illustrates a master that has a power transmitter for each of its coils in some embodiments of the invention.

FIG. 13 conceptually illustrates a master in some embodiments of the invention with coils that have the same frequency and a multiplexer to activate coils at different times.

FIG. 14 conceptually illustrates induction between the master and the slave by using more than one coil on the master or the slave in some embodiments of the invention.

FIG. 15 conceptually illustrates a process of some embodiments of the invention to change a master device's coil pattern in some embodiments of the invention.

FIG. 16 conceptually illustrates a multi-coil slave with induction charging in some embodiments of the invention.

FIG. 17 conceptually illustrates a process for reconfiguring coils of a slave device in some embodiments of the invention.

FIG. 18 conceptually illustrates a process for terminating power generation in the slave in some embodiments of the invention.

FIG. 19 conceptually illustrates a process for configuring the slave's coils for either power generation or data transmission in some embodiments of the invention.

FIG. 20 conceptually illustrates a hybrid system of some embodiments of the invention where the master uses an induction charger as a power source to power itself and then uses a high frequency directional and focused RF beam to power up one or more slave devices and communicate with them.

FIG. 21 conceptually illustrates a master in some embodiments of the invention that acts as an induction charger and uses induction to charge the slave before using its high frequency directional beam to communicate with the slave.

FIG. 22 conceptually illustrates two slaves in some embodiments of the invention that use the power of a master's coils to power up or charge their batteries and then communicate with each other using their communication transceivers.

FIG. 23 conceptually illustrates an element in some embodiments of the invention that is designed to be a coil at low frequencies and a multiple antenna at high frequencies with beam forming capabilities.

FIG. 24 conceptually illustrates a computer system with which some embodiments of the invention are implemented.

DETAILED DESCRIPTION

In the following detailed description of the invention, numerous details, examples, and embodiments of the invention are set forth and described. However, it will be clear and apparent to one skilled in the art that the invention is not limited to the embodiments set forth and that the invention may be practiced without some of the specific details and examples discussed.

Some embodiments provide a wireless transmitter that uses radio frequencies (RF) with small high gain directive antennas and high frequency radio waves or electromagnetic induction to charge one or more receiving devices and then communicate with them. Wireless communication is convenient because it allows devices to connect to each other without wires. Wireless power is convenient because it

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removes the need for wires and connectors. This invention combines these two aspects together.

Some embodiments use radio frequency (RF) instead of resonant electromagnetic induction to charge and communicate with slave devices. Throughout this specification the 60 GHz spectrum is used for describing the RF charging aspect of this invention. However, 60 GHz is only one special case of using higher frequencies for implementing this invention. In the U.S. the 60 GHz spectrum band can be used for unlicensed short range data links (1.7 km) with data throughputs up to 2.5 Gbits/s. Higher frequencies such as the 60 GHz spectrum experience strong free space attenuation. The smaller wavelength of such high frequencies also enables the use of small high gain antennas with small beam widths. The combination of high attenuation and high directive antenna beams provides better frequency reuse so that the spectrum can be used more efficiently for point-to-multipoint communications. For example, a larger number of directive antennas and users can be present in a given area without interfering with one another, compared to less directive antennas at lower frequencies. Small beam width directive antennas also confine the electromagnetic waves to a smaller space and therefore limit human exposure. The higher frequencies also provide more bandwidth and allow more information to be wirelessly transmitted. Thus, the same antenna can be used to for power generation and communication.

There are several standards bodies that are using high frequencies such as 60 GHz. These include WirelessHD, WiGig, and WiFi IEEE 802.11ad. The WirelessHD specification is based on the 7 GHz of continuous bandwidth around the 60 GHz radio frequency and allows for digital transmission of uncompressed high definition (HD) video, audio and data. It is aimed at consumer electronics applications and provides a digital wireless interface for file transfers, wireless display and docking, and lossless HD media streaming for ranges up to 10 meters. Theoretically it can support data rates as high as 25 Gbit/s. The 60 GHz band usually requires line of sight between transmitter and receiver because of high absorption. The WirelessHD specification gets around this limitation by using beam forming at the transmitter and receiver antennas to increase effective power of the signal.

The WiGig standard (short for the "Wireless Gigabit Alliance") is also promoting high speed wireless communication over the unlicensed 60 GHz spectrum and is a competing standard to WirelessHD. The WiGig standard is also taking advantage of the high absorption of 60 GHz that limits signal propagation and reduces interference with other wireless systems.

IEEE 802.11 ad is also under development by the IEEE task group for the upcoming 60 GHz standard. This is essentially a faster version of the IEEE 802.11 standard that uses the 60 GHz band. However, because it uses a new spectrum it will not be backward compatible with existing WiFi.

Wireless USB is a standard which does not use 60 GHz. Wireless USB uses the Ultra-wideBand (UWB) radio platform that operates in the 3.1 to 10.6 GHz frequency and can transmit 480 Mbit/s at distances up to 3 meters and 110 Mbit/s at up to 10 meters. While the goal of 802.11 family (802.11*) WiFi is to replace Ethernet cables and provide wireless Internet access, the goal of Wireless USB is to remove the cables from USB based PC peripherals. Wireless USB can be used for printers, scanners, digital cameras, MP3 players, game controllers, hard disks, and flash drives. Both WirelessHD and WiGig are competing in some aspects

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with the Wireless USB standard. Inductive Charging in some embodiments is performed at lower frequencies such as frequencies of less than 100 MHz, whereas RF frequencies used in some embodiments is greater than 900 MHz or 1 GHz. The higher the RF frequencies, the smaller the wavelength and hence the smaller the size of the antenna.

None of the above standards address charging slave devices before communicating with them. Instead they assume that the slaves have access to some power source such as AC power or a battery. In some embodiments a master device uses one or more directional antennas or uses antenna array beam forming to transmit high frequency RF signals to one or more slave devices to power them up or charge their batteries. By using the directional antennas or using antenna array beam forming, these embodiments concentrate the power on a smaller area.

Some embodiments provide a networked system with a master device that can power-up or charge a plurality of slave devices and communicate with them. In some embodiments the master is connected to other network devices and/or Intranet/Internet though packet-based or non packet based networks and wired or wireless networks (such as Bluetooth®, Wireless Local Area Network (WLAN), fourth generation (4G) cellular, Code Division Multiple Access (CDMA), Time Division Multiple Access (TDMA), Worldwide Interoperability for Microwave Access (WiMAX), UWB and 60 GHz). The master in some embodiments monitors the power status of a plurality of slaves, decides which subset of those slaves get charged and what their charging priorities are. The slaves in some embodiments have different power status and capabilities (some have power to communicate, while others have low battery, and yet others have no battery).

In some embodiments, the slave has sensors (e.g. temperature, gyration, pressure, and heart monitor) with electronic circuitry that are powered up by the master, perform their sensing functions and communicate their data to the master, a network server, or some other device. The channel for power transfer in some embodiments is RF or electromagnetic induction. A control channel is used in some embodiments by the master to send commands to the slaves. Some embodiments use the same channel for power, control, and communication. One, two or all of the power, control, and communication in some embodiments use different channels (e.g. different frequencies, different radios, different antenna, and different coils for induction) or different methods (RF Beam and induction).

In some embodiments, the master configures the system to increase power and communication efficiency (e.g. uses several antenna and beam steering for RF, or several coils and coil pattern optimization for induction). In some embodiments the master and the slave have a matrix of coils (for induction) and the master changes its transmit coil pattern in order to optimize power transfer to the slave. Several masters in some embodiments cooperate or are configured by a network server or remote user to use beam steering and different antennas to charge a plurality of slaves. In some embodiments the slaves provide their identifying information and register themselves in a slave information database. In some embodiments the masters provide their identifying information and register themselves in a master information database. The master in some embodiments receives a slave's identifying information (MAC ID, network Internet protocol (IP) address, name, serial number, product name and manufacturer, capabilities, etc.) by communicating with the slave or by examining the slave information database to select which slaves to power up, charge,

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or communicate with. A slave in some embodiments prevents non-authorized masters (or networked servers) from trying to charge it or power it up by checking the master's identifying information with the authorized master's list stored on the slave. The master's selection and power scheduling of slaves is dependent on the priorities of slaves' functions and data in some embodiments.

In some embodiments, the master uses frequency hopping and time hopping to select some slaves from a plurality of slaves. A master in some embodiments charges a slave to a pre-set high level, then communicates with it until battery falls to a pre-set low level, and then charges slave again, etc. A master in some embodiments powers-up/charges a slave's battery and communicate with the slave at the same time. In some embodiments a slave that is powered up gets connected to a network (packet-based or non packet based, wired or wireless such as Bluetooth®, WLAN, 4G cellular, CDMA, TDMA, WiMax, UWB and 60 GHz) through the master, through other nearby slaves, or directly to an access point/tower.

A master that does not have a network connection in some embodiments charges a slave and uses the slave's network connection to connect to the network and perform networked operations such as downloading software and driver upgrades. In some embodiments a slave that is powered up and charged becomes a master charger for other slaves.

The master and the slave optionally have a touch screen and/or keyboard for entering data which can be displayed on the screen and/or communicated, respectively, to the slave and the master in some embodiments. A network server that is connected to the master is effectively the real master in some embodiments and instructs the master, monitors the power status of a plurality of slaves, decides which subset of those slaves are powered up/charged/communicate with, and what their priorities are. Also, an authorized remote user in some embodiments uses the network to connect to the network server and control the network server, which in turn instructs the masters to monitor the power status of a plurality of slaves, decide which subset of those slaves are powered up/charged/communicate with, and what their priorities are.

A non-conductive spacer is used in some embodiments to create a separation distance of several wavelengths for RF charging and communication. Networked master chargers (both RF and induction) are in some embodiments built-in to conference room tables, office tables or lightweight pads so that meeting participants are able to wirelessly charge their devices, connect to each other or to the Intranet/Internet, transmit/receive information, and make payment transactions. Multi-coil induction masters, tables or pads in some embodiments have a credit card reader. Similarly, RF masters in some embodiments include credit card readers, so users can "sweep" their card for magnetic cards or they can read NFC-enabled cards with NFC. Therefore, users of slaves are not only able to charge their devices but also make payment transactions. For instance, phones with near field communication (NFC) capabilities in some embodiments are charged and are also used for contactless payment so that the user places the phone near those coils (or RF beams of a master in the case of RF-based master) in order to transmit payment information to a secured server on the Internet. Alternatively, credit cards in some embodiments have a chip so that they transmit their information to the master device.

Some of the coils of a multi-coil master (or RF beams of a master in the case of a multi-antenna RF-based master) in some embodiments are dedicated and optimized for communication, while others are optimized for charging. The

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master has different means for power, e.g., one or more of AC and adaptor, battery, induction, etc.

In some embodiments, a master uses an external induction charger to get charged, and then uses a high frequency directional and focused RF beam to power up a slave device and communicate with it. A master uses induction in some embodiments to charge a slave and uses a communication transceiver (e.g. a high frequency directional and focused RF beam) to communicate with the slave. Two or more slaves are charged by a master induction charger in some embodiments and then communicate with each other directly or through the master, possibly under the control of a remote network server.

In some embodiments an element is designed for the master, slave or both so that at low frequencies the element is like a coil inductor and at high frequencies the element is like an antenna. This means that at the same time both RF power and induction power are available. If the distance is short then waves cannot be created and it will be more like induction. So distance is used to select one mode or the mode is chosen automatically. In other embodiments, the master, slave or both to have two different elements for different distances (one for short distances and one for far distances). In some of these embodiments, the master does time multiplexing between the two or select one over the other. In some embodiments, an element is designed to be a coil at low frequencies and a multiple antenna at high frequencies with beam forming capabilities. The length of the coil is much bigger than the size of antenna required for RF at high frequencies. In some embodiments, this coil is divided into multiple RF antennas and the resulting multiple antennas is used to do beam forming.

Some embodiments provide a system for charging devices. The system includes a master device and a slave device. Some embodiments provide a method for charging devices in a system that includes a slave device and a master device. The slave device includes (1) an antenna to receive a radio frequency (RF) beam and (2) a power generation module connected to the antenna that converts RF energy received by the slave antenna to power. The master device includes (1) a directional antenna to direct RF power to the antenna of the slave device and (2) a module that provides power to the directional antenna of the master device.

Some embodiments provide a system for charging devices. The system includes a master device and a slave device. Some embodiments provide a method for charging devices in a system that includes a slave device and a master device. The master device includes a first group of coils to transmit energy by induction. The first group of coils is arranged in a first pattern. The master device also includes a module that provides alternating power to the first group of coils. The master device also includes a processing module. The slave device includes a second group of coils to receive energy by induction from one or more coils of the master device. The second plurality of coils is arranged in a second pattern. The slave also includes a power generation module connected to the second group of coils that converts the received induction energy to power. The master processing unit (i) receives information from the slave regarding the slave coil pattern and (ii) based on the received information, activates a set of coils in the first group of coils to optimize an amount of induction energy received by the second group of coils.

In some embodiments, the processing module (i) receives information regarding the amount of induction energy received by the second group of coils and (ii) when the induction energy received by the second group of coils does

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not satisfy a threshold, activates a different set of coils in the first group of coils to further optimize an amount of induction energy received by the second group of coils.

Some embodiments provide a system for charging devices. The system includes a master device and a slave device. Some embodiments provide a method for charging devices in a system that includes a slave device and a master device. The master device includes a first group of coils to transmit energy by induction. The master device also includes a module that provides alternating power to the first group of coils. The slave device includes a second group of coils to receive energy by induction from one or more coils of the master device. The second group of coils has a set of operating parameters. The slave also includes a power generation module connected to the second group of coils that converts the received induction energy to power. The slave also includes a processing module. The slave processing unit (i) receives a set of master device's parameters and (ii) based on the received master device's parameters, reconfigures one or more of the operating parameters of the second group of coils to maximize the received induction power.

In some embodiments, the master device's parameters include an operating frequency of the master's induction frequency, data and modulation method used by the master, and an identifying information of the master. In some embodiments, the operating parameters of the slave device are reconfigured by tuning of one or more coils in the second plurality of coils. In some embodiments, the operating parameters of the slave device are reconfigured by calibrating of one or more coils in the second group of coils. In some embodiments the operating parameters of the slave device are reconfigured by impedance matching of one or more coils in the second group of coils.

Several more detailed embodiments of the invention are described in sections below. Section I provides an overview of several embodiments of the invention. Section II describes different embodiments of the invention that provide charging remote device using RF beams. Next, Section III describes several embodiments that charge remote devices using induction. Section IV discusses hybrid embodiments that charge remote devices using both RF beams and induction. Finally, section V provides a description of a computer system with which some embodiments of the invention are implemented.

I. Overview

A. Charging and Communicating with One or More Slaves

FIG. 1 conceptually illustrates an overview of the networked aspect of some embodiments of the invention. Masters in some embodiments charge and communicate with one or more of the slave devices within their vicinity. The master in some embodiments is connected to other network devices. In the example of FIG. 1, master A 105 is connected using a wireless channel (packet-based system or non-packet based system, Bluetooth®, WLAN, 4G cellular, CDMA, TDMA, WiMax, UWB and 60 GHz, etc.) through an access point 155 to a network 110 and powers up slaves 1 and 2. Master B 115 has multiple antennas 117, is connected to a network 110 using a wireline, and powers up slaves 3, 4 and 5. Master C 120 is also connected to a network 110 using a wireline. Master B 115 and master C 120 cooperate (or are controlled by a controller device such as network server 135 or remote user 140) and use beam steering to charge slave 6. The slaves differ in their power status and capability in some embodiments. Some slaves have power and communicate, while others have low bat-

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tery, and yet others have no battery. The charging of the slaves is done wirelessly with methods such as a resonant electromagnetic induction channel or an RF channel.

B. Power Transfer to Authorized Slaves

Charging in some embodiments is initiated by the slave or by the master when the two are close to each other (for example either automatically or by pressing a button on the slave or the master, respectively). A master selects which slaves to power up and communicate with in some embodiments. The slaves have identifying information about themselves stored in their memories. This stored information includes one or more of the slaves' media access control address (MAC address or MAC ID), network IP address, name, serial number, product name and manufacturer, capabilities, etc. The master (or a controller device such as a network server, or a remote user) requests that information. In some embodiments, the slaves are proactive and communicate with the master (or a controller device such as a network server, or a remote user) if they have power (e.g. charge my battery, I want to send you some data, etc.) and provide their identifying information and register themselves in a slave information database. In some embodiments, the master has access to a slave information database that includes an authorized list. This database is locally stored 125 on the master 115 or it is stored on a possibly larger networked database 130.

In some embodiments, a master that employs a focused directional RF beam uses beam steering to focus the beam on a particular slave, power the slave up slightly to get slave's identifying information, and only continue powering up/charging and communication if the slave's identifying information match with an entry on the authorized list. For instance, only a slave with a certain MAC ID, network IP address, name, serial number, product name, manufacturer, capabilities, etc. may be powered up, charged or communicated with. For RF-based methods frequency hopping methods are also used in some embodiments by the master and authorized slaves to allow them to get power while unauthorized nearby slaves (that do not know the hopping sequence) do not receive much power. Similarly, a master that employs focused RF beams uses time hopping to power up slaves.

A master that uses resonant induction uses the right resonant frequency that matches the slave, coil matrix frequency hopping, coil matrix time hopping, and current/voltage to power up a nearby authorized slave in some embodiments. The slave's identifying information is communicated by the slave to the master in some embodiments if the slave has some power (communicated using RF communication, backscattering, infrared or other methods), or communicated after an initial sub-optimal power-up. Again, the master only transfers power to the slave if the slave's identifying information match with an entry on an authorized list. In some embodiments, the slave's resonant frequency is stored at the master (e.g., in slave information database 125) or at a network database (e.g., in slave information database 130).

C. Power Transfer only from Authorized Masters

A slave prevents non-authorized masters from trying to charge it or power it up (or networked servers from commanding masters to charge it or power it up) in some embodiments. Slaves store identifying information about masters (or networked servers) that are authorized to charge them. The stored information about authorized masters or networked servers includes one or more of the following information about the masters: the masters' media access control address (MAC ID), network IP address, name, serial

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number, product name and manufacturer, capabilities, etc. The slave requests identifying information from the master or the network server. The master (or the network server) in some embodiments is also proactive and sends its identifying information to the slave. The masters in some embodiments also register themselves and their identifying information in a master information database 150. The slave in some embodiments checks the master's information with the authorized list and if there is not a match the slave disables charging and/or power-up.

D. Master's Scheduling of Slaves

The selection and power scheduling of slaves in some embodiments are dependent on the priorities of slaves' functions or data (e.g. slave 1 with a higher priority gets 5 minutes scheduled for charging and slave 2 with a lower priority gets 3 minutes). A slave information database 125 stored at the master 115 or a slave information database 130 stored on the network include priorities for slaves and their data in some embodiments. The slaves also communicate their data (and possibly the priority of their data) to the master in some embodiments. Based on this information the master then decides on a course of action.

E. Charging and Communication Strategies

The power status of slaves and their power-related requests and the master's response strategy vary significantly in different embodiments. The followings are several examples: (1) slave has battery and power and is ready to communicate. Master may communicate; (2) slave has battery and some charge, and slave requests to communicate. Master may allow communication or overrule and charge the slave further first (e.g. if after communicating the quality of slave data is not high because of the low power status of slave); (3) slave has battery and some charge, but slave requests to be fully charged. Master may honor the request and charge the slave or may overrule and communicate with the slave (e.g. if live communication has higher priority); (4) slave has battery but battery has no charge. Master may charge the battery first or just power up the slave and communicate first if communication priority is high; (5) for options 1, 2, 3, and 4 above if after communicating a slave's battery charge level reaches zero or some pre-determined low level then the battery is charged to some higher pre-determined level before resuming communication; (6) for options 1, 2, 3, and 4 above if there is sufficient power transferred from the master to the slave then the slave may communicate at the same time that the master is charging the battery; (7) slave has battery and after it is charged by the master to a sufficient level the slave connects and communicates with nodes in another network (e.g. slaves 1 and 3 connect to Bluetooth®, WLAN, 4G cellular, WiMax, UWB, 60 GHz and mesh ad-hoc networks). The master optionally continues to charge the slave or charge the slave once the slave's battery levels reach pre-set low levels; (8) slave has no battery and needs to be powered up before communication. Master powers up the slave before communicating (e.g. slave 2 in FIG. 1).

F. Charging Channel, Communication Channel and Control Channel

In some embodiments the same channel is used for both charging the slave and communication, while in other embodiments different channels are used for charging and communication (e.g. two RF channels possibly with different frequencies—one for charging and one for communication, or charging with resonant induction and communication with RF). In some embodiments, the master also uses a control channel to inform the slaves what it wants to do. Thus, all the commands could come over the control chan-

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nel, although it is also possible to send commands over the data communication channel as well. The control channel does not need to have high bandwidth. Thus, while the communication channel and the control channel use the same frequency in some embodiments, the control channel uses a lower frequency lower bandwidth channel than the communication channel. The master may also use an induction charger or RF charger to charge its own battery if its power source is a rechargeable battery instead of AC power.

G. Connecting to New Networks for Slaves and/or Master

When the master is connected to a network (packet-based or non packet-based, Bluetooth®, WLAN, 4G cellular, TDMA, CDMA, WiMax, UWB, 60 GHz, etc., or wired connection) then a powered up or charged slave is also connected to the same network through the master (e.g. slave 4 in FIG. 1). Likewise, when a slave is connected to a network (Bluetooth®, WLAN, 4G cellular, WiMax, UWB, 60 GHz, etc., or wired connection) then the master gets connected to that network after the master charges that slave (e.g. slave 3 and Master B 115 in FIG. 1). Thus, after powering up slave 3 not only is slave 3 able to connect to its wireless network (Bluetooth®, WLAN, 4G cellular, WiMax, UWB, 60 GHz, etc.) but master B 115 is also able to connect to those networks through slave 3 acting as a network node. If a master does not have a network connection and a slave does the master in some embodiments charges the slave and use its network connection to connect to the network and perform networked operations such as downloading software and driver upgrades.

H. Slave Mesh Networks

A slave that gets powered up acts as a network node and communicate with other slaves in some embodiments. For instance, in FIG. 1 slave 1 is initially powered up by master A 105. Master A 105 cannot communicate with slave 7 because slave 7 is not within its communication range. However, master A 105 can communicate with slave 1, and slave 1 can in turn communicate with slave 7. Likewise, slave 7 can communicate with slave 8, etc. Thus, by charging slave 1 the master has connected itself to a mesh network of slaves and other networks that it was not connected to before.

I. Slave Becoming Chargers

Slaves that get charged act as masters and charge other slaves in some embodiments. In FIG. 1 slave 5 is charged by master B 115. Slave 9 also needs to be charged. In this example, slave 5 charges slave 9. This may for example be because slave 9 is too far from master B for charging.

J. Network Server or Remote User Controls the Master

The explanations above assume that masters A and B control the decision making in FIG. 1. It is also possible that a network server is in command and is the "real" master. For example, the network server 135 instructs master B 115 to power up the slaves in its vicinity and requests information from the slaves. Master B 115 then sends the slaves' identifying information and any matching entries it has in its own database 125 (together with any slave requests) to the network server 135, the network server further searches the networked slave information database 130 for additional identifying and matching information, and then instructs the master on a course of action (e.g. charge slaves 1 and 3, but no further action with unauthorized slave 4). In some embodiments, an authorized remote user 140 uses the network 110 to connect to the network server 135 and control the network server, which in turn controls the masters as just described. Thus, depending on which component is in control (remote user, network server, or a master) that

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component monitors the power status of a plurality of slaves, decides which subset of those slaves get charged and what their charging priorities are.

II. Charging with RF

In some embodiments, the master uses a narrow focused RF beam for charging. Converting RF signals to DC power has been done in Radio-Frequency Identification (RFID) far field applications. In near field RFID applications, where the distance between the RFID reader and the tag is less than the wavelength of the signal, mutual inductance is used for communication. However, in far fields RFID applications, where the separation distance between the RFID reader and the tag is much greater than the wavelength of the signal, backscattering is used for communication. With backscattering a tag first modulates the received signal and then reflects it back to the reader. There are several important differences between the disclosed embodiments of the current invention and those of far field RFID which are described through this specification. For instance, RFID does not use directional beams and hence spreads the power of the transmission over a wider space and unnecessarily exposes humans to electromagnetic radiation. RFID tags also require little power to operate (e.g. the receive power is of the order of 200 microwatts) compared to the slave devices that the disclosed embodiments of the current invention powers-up and communicates with. For instance, the receive power for the slaves in some embodiments of the invention is of the order of milliwatts and higher. The upper receive power range depends on the transmit drivers and the size of the coils or antennas, and in some embodiments goes above the Watt range. RFID operates in lower frequencies (e.g. less than 960 MHz) and hence provides smaller communication bandwidths and requires much bigger antennas compared to the higher frequencies used in different embodiments of the current invention. Also, RFID uses backscattering for communication which is a low data rate method because the antenna is turned on and off by the data like an on-off modulation switch. The embodiments of the current invention provide a much higher data rate because standard wireless transceiver modulation methods are used (e.g. modulations for cellular, 802.11*, Bluetooth®) and then the data is sent to the antenna.

In contrast to RFID, some embodiments of the current invention use narrow directional focused beams in order to simulate a wire connection for charging and communication. This focusing of the beam provides more power and energy for charging slave devices. A directional antenna is an antenna which radiates the power in a narrow beam along a certain angle and directed to a certain area or receive antenna. Some embodiments of the invention use directional antennas that provide a large gain in their favored direction. Some embodiments use a group of antennae (an antenna array) arranged to provide a large gain in a favored direction.

FIG. 2 conceptually illustrates an overview of a system 200 of some embodiments of the invention where the slave does not have a battery. The master 205 is the bigger system component with a good power source 215 (e.g. AC or a good battery life), whereas the slaves 210 (only one is shown for simplicity) have limited sources of power (e.g. limited battery or no battery). Example master devices are a car, PC, laptop, cell phone, digital/video camera, or multimedia device such as an iPod. The slave device could be any non-battery device (e.g. memory stick or memory device) or DC or battery operated device. Some examples of the latter are laptop, cell phone, PDA, wireless headsets, wireless mouse, wireless keyboard, pager, digital/video camera, external hard drive, toy, electronic book readers, sensor,

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CD/DVD/cassette/MP-3 player, toothbrush, lighting devices, electronic appliances, or a car (e.g., an electric car). Even AC powered devices in some embodiments use this system as a backup power system in case AC power goes off. Thus, a battery operated master could power up an AC powered device that temporarily has lost its AC power source.

In some embodiments, the master is just a dedicated charging device and does not communicate with the slaves other than for charging. The master has a power source 215 such as

AC or battery. The power source powers the master's RF transceiver 220, processing module 225 and network card 230 which are all connected to a bus 235. Although the term transceiver (which implies a module with shared circuitry for a transmitter and receiver) is used in FIG. 2 and some of the following figures, the invention is not restricted to transceivers. Some embodiments use transmitter-receiver modules (which has transmitter and receiver in the same housing without common circuitry) while other embodiments use separate transmitter and receiver modules. The master may be connected to a network 240 such as the Internet through its network card 230 or through a wireless connection. The master has a high gain antenna 245. The master's RF transceiver 220 uses the antenna 245 to shoot its focused beam to the slave to power up the slave. This power up RF wave is not modulated since it is used for power generation and not data transmission. The antenna in some embodiments is comprised of sub-elements such that through different phases and amplitudes the master uses beam steering to change the angle of the beam as described by reference to FIGS. 4 and 8 below. The battery-less slave 210 of FIG. 2 also has a directional antenna 250 that is connected to a power generator component 255. The power generator provides power from the received radio frequency signals. The energy from the master's RF transmission is converted by this component to a supply voltage (not shown) and is stored in a capacitor (not shown). This supply voltage is then provided to the slave's transceiver 260 and processing module 265 to power them up. The slave may optionally have a network card (not shown) which is also powered up with this supply voltage. The slave uses the network card or its RF transceiver to connect to a network. Once the slave is powered up it is ready to communicate with the master. The master then sends commands (e.g. read from slave's memory, write to slave's memory) to the slave in some embodiments. The slave sends receive acknowledgments to the master and responds to commands. For example, in response to a read command the slave returns data (text, images, audio, and video). The slave also sends status information to the master such as "I am this device", "I have data", "I need to be charged", "My battery level is 50%", etc in some embodiments. The range of this system is not limited by the radio since the radio requires lower sensitivity and can handle low input signals. The terms RF-based master or RF beam master are interchangeably used in this specification to refer to a master that uses an RF beam to charge the slaves.

The power generator in FIG. 2 is used to generate a voltage supply and store it in a capacitor. FIG. 3 conceptually illustrates an alternative system 300 of some embodiments of the invention where the slave has a battery. The master components are similar to the components shown in FIG. 2. In these embodiments, the slave battery 315 is charged by a high frequency directional RF beam from a master device 305. The battery is then used for powering the slave 310 for communication. In FIG. 3 slave 310 uses a low

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frequency low bandwidth control channel 320 to adjust the position of a switch 325. In FIG. 3 slave 310 includes a control module 320 that uses a low frequency low bandwidth control channel to adjust the position of a switch 325 and set whether to use the energy captured by the power generator 330 to power up the device, charge the battery 315, or both. The control channel 320 could use a simple modulation method such as amplitude modulation (AM), frequency modulation (FM), phase, and quadrature amplitude modulation (QAM), rather than complex wireless modulation techniques (e.g. Orthogonal frequency-division multiplexing (OFDM)). These simple modulation schemes require less complex hardware and processing and are optimal for low-speed data. Either the slave, or the master, or both in combination can decide whether the slave should communicate at first or not. For example, the slave looks at its battery, decides how much life it has, and then determines whether to charge, communicate, or do both in some embodiments. Feedback mechanisms could be used to dynamically improve the system. For instance, if the slave sends data to the master and the master determines that the data from the slave is bad quality then the master in some embodiments uses the control channel to tell the slave to not use any of the received energy for charging and instead use all of it for live communication only. There are several possible strategies for slave power status and master charging, eight of which were listed in the previous section titled "Charging and Communication Strategies".

FIG. 4 illustrates a more detailed diagram of the embodiments shown in FIGS. 2 and 3. The master 405 has a power source 410 such as AC power (which is rectified and regulated with an adaptor), battery, or some other power generating device (e.g. induction from another source as described below by reference to FIG. 20). The master's RF transceiver radio has a transmitter (Tx) 415, a receiver (Rx) 420, and a digital baseband processing unit 425. The transmitter includes a Digital to Analog Converter (DAC) (not shown). RF transmissions for power are not modulated, whereas data transmissions use modulation and optionally coding. The receiver includes an Analog to Digital Converter (ADC) (not shown). The digital baseband unit 425 communicates with a processing module 430 that includes a digital signal processing unit 435, a processor 440 and memory 445. The transceiver's transmitter and receiver use a duplexer 455 that allows bi-directional communication over a single channel and antenna. Some embodiments include an optional attenuator 450 which is placed in front of the receiver. This protects the receiver from being overloaded by the transmitter or by other large incoming signals. The attenuator also allows the receiver to receive when the transmitter transmits. The attenuator attenuates the entire signal and is like an all-pass filter. Alternatively, instead of the attenuator some embodiments include frequency-selective filter to protect the radio. FIG. 4 shows a general case where the antenna has sub-elements 442 that enable steering of the beam. Each antenna sub-element is effectively a separate antenna and throughout this specification the term antenna and antenna sub-element will be used interchangeably. In FIG. 4 a beam-forming unit (or beam former) 453 is placed before the duplexer 455. In other embodiments the beam-forming unit is placed after the duplexer. The beam former takes the output of the transmitter (Tx) and generates different phase and amplitudes for each of the antenna sub-elements in order to steer the beam. Likewise, on the receive side the beam-former takes multiple receive signals from each antenna sub-element and combines them with multiple phases/amplitudes and provides the output to the

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receiver (Rx). In yet other embodiments there is not an explicit beam-forming component and the beam-forming function is integrated into the transmitter (Tx) and receiver (Rx) where they generate the phase and amplitudes for beam-forming. The master's beam former is used to focus the transmit power on the slave's antenna for optimum power transfer, while the slave's beam former is used mostly for communication.

In some embodiments, the master and slave use a frequency hopping mechanism in order to avoid unauthorized slave devices from using the master as a charger. For example, a particular company that produces slave devices (cell phones, iPod, laptops, etc) and chargers for them could include a frequency hopping mechanism that both the slave and the master devices from that company would know about. For instance, a master detects and charges a slave using frequency f1 and after an elapsed time T1 the master's frequency is changed to f2 and the slave would also know that it has to change to that frequency. After a further elapsed time of T2 the master's frequency is changed to f3 and the slave changes too, etc. An unauthorized slave would not know how to change its frequency with time and as a result of the mismatch between its frequency and that of the master then it will not receive a lot of power from the master. In FIG. 4, the baseband of the transmitter has a frequency hopping unit 460 that generates the clock 463 frequency for the transmitter and receiver. In some embodiments, the transmitter and receiver have the same frequencies while in other embodiments they have different frequencies. In some embodiments the master would have an interface where the user programs the frequency hopping algorithm and downloads it to certain slaves such that the master could only charge and communicate with slave devices that the user chooses. In some embodiments, the master performs time hopping. With time hopping the master transmits at different times based on a known sequence between the master and the slaves. The slaves look at incoming energy at those known specific time intervals. In some embodiment, during each time hop the frequency also changes in order to separate the slaves further.

The slave 470 in FIG. 4 has components similar to the master 405, the main difference is the power generation component 473 which will be discussed in more detail below. The antenna elements 499 of the slave receive the RF waves from the master. The energy from the master's non-modulated RF transmission is converted by the slave's power generator to a supply voltage, Vdd, and is stored in capacitor C 475. This supply voltage is then fed to a voltage converter 477 whose output provides different voltage levels as required by the different slave modules. The outputs from the voltage converter are then provided to the slave's transceiver 480 and processing modules 483 (and networking module if it has one) and power them up. It is also possible that different modules have different Vdd values. If the slave is a sensor the processing module may also optionally have a sensor and associated circuitry. Again, an optional attenuator 485 may be placed in front of the slave's receiver to protect it from being overloaded by the transmitter or by other large incoming signals. The attenuator also allows the receiver to receive when the transmitter transmits. A frequency-selective filter 487 is also used in some embodiments to protect the radio. For instance, when two different frequencies are used for power generation and communication, the filter may be chosen such that it rejects the power frequency but allows the communications frequency. Like the master, the slave also has beam forming

488 for steering its beam, and frequency hopping 481 for limiting power transfer to authorized slaves.

The calibration block 490 calibrates and tunes each antenna to maximize power. It matches the impedance of each antenna with its rectifier. The configuration block 492 controls the calibration block. Since these blocks also need power, some embodiments initially power up a small portion of the circuits. For instance, one or more of the antenna sub-elements receive the RF power. The signal is then rectified (by the rectifier 493), the power absorbed, and converted to a supply voltage, V_{dd}, for a small power absorber, and stored it in a small capacitor 494. This supply voltage is then provided to the slave's configuration 492 and calibration blocks 490. The calibration block calibrates the matching of each antenna or frequency tunes to the master's frequency each of the antennas in some embodiments. The power generator has a rectifier 495 for each of the antenna sub-element 499 signals. A summer 471 then sums the output of all rectifiers 495. The configuration block monitors each antenna signal (before the power generator's rectifiers as shown in FIG. 4, although it could also monitor after the rectifiers). The configuration block then controls the calibration block to change the antenna tuning in order to maximize the signals. Once the power generator's V_{dd} reaches a pre-set level the configuration block uses a switch 496 to provide the power to the rest of the system, such as the processing module 483, the RF transceiver 480, and any other modules (e.g. network card module if there is one in the slave). If the slave has a battery 497 the switch is also used in some embodiments to enable battery charging only, or enable battery charging and power-up together so that the slave is able to communicate while the battery is charging. The battery block has associated circuitry to measure its parameters and prevent overcharging. The battery block also includes a regulator and a battery charger unit in some embodiments. For most consumer electronics devices these changes could be incorporated into their battery packs. The slave in some embodiments also has a power management module 498 which performs functions to increase the battery life of the device. For instance, the power management unit in some embodiments puts certain modules in sleep or idle mode, and/or use frequency and voltage scaling to reduce power consumptions.

The calibration block also has a backscattering transceiver in some embodiments. If the RF transceiver is not powered on and the slave needs to communicate back to the master the calibration block uses antenna modulation in the form of backscattering (e.g. acknowledgement that it received data, or transmission of information like MAC ID, name, etc.). The received signals at the slave also include control information, where the master uses a control channel to inform the slaves what to do. The slave's control channel will demodulate and extract the commands for the slave to execute. Control information also includes read commands, write commands, turn on and off commands for the RF transceiver, scheduling for sending and receiving data, configuration and calibration of software radios for different standards.

In some embodiments, the slave stores identifying information about masters (or networked servers) that are authorized to charge the slave, such as the masters' media access control address (MAC ID), network IP address, name, serial number, product name and manufacturer, capabilities, etc. This information is stored in its memory 474 or in its configuration block 492. The slave requests identifying information from the master or the network server 135. The master (or the network server) is also proactive in some

embodiments and sends its identifying information to the slave. Identifying information about the masters is stored in a networked database 150 in some embodiments. The slave in some embodiments checks the master's information with its authorized list and if there is not a match the configuration block 492 controls the switch 496 so power does not reach some or all of its circuits and/or battery.

The charging application is for distances of 1 meter or less. The energy efficiency of the system is the efficiency of the transmitter (DC to RF conversion) and the receiver (RF to DC conversion). The path loss is proportional to the inverse of the distance squared and inverse of the frequency squared. For instance at 60 GHz, at a distance of 1 meter the path loss is 64 dB. Thus, if the master transmits 100 mW the receiver gets about 20 dBm, since there is little loss. The conversion of this received RF to DC has about 10-20% efficiency, which translates into 10-20 mW.

This method is used both to charge the slave device and to send data to it in some embodiments. The higher carrier signal frequency enables the use of much smaller antennas. Because the antennas are small, in some embodiments the master devices (and even slave devices) have a number of antennas so that orientation with the charger can vary. When the slave has directional antenna, power efficiency is greatly enhanced. Power efficiency is also most optimal when the antenna of the master and slave are pointing directly towards each other.

In some embodiments, the master is a device (e.g. a PC) that has AC power or has a number of batteries and the slave (e.g. cell phone) has a battery that may require charging. Charging is either initiated by the slave or by the master. For example, the user places the slave near the master and presses a button on either the master or the slave to initiate charging (or charging is initiated after the master polls the slave). The slave makes a digital request to the master to be charged. Each antenna on the master receives a DC current. However, the antenna that is pointing to the slave device's antenna will receive the largest current. Each of the master's antennas effectively acts as a USB port since the antennas are used for communication as well as charging. If there are more than one slave then the master in some embodiments powers up all of them if need be and communicate with all of them using multiplexing. This eliminates the need for the master device to have multiple USB ports. Specifically, currently for each device there is a need for one USB port. For example, there is one for the mouse, one for the keyboard, one for a memory stick, etc. Using the embodiments of the current invention, they can all share the same wireless communication link with multiplexing for communication. For a USB type slave device that has no battery the master just acts like a remote battery so that the slave is able to communicate. For a more powerful slave device, such as a cell phone, the master acts like a charger and a communication device. If the slave has sensors (e.g. temperature, gyration, pressure, and heart monitor) with electronic circuitry then they are powered up by the master, perform their sensing functions and communicate their data to the master, a network server, or some other device. In some embodiments, either or both the master and the slave have a touch screen and/or keyboard. For example, the master's keyboard is used for input and its touch screen is used for both input and output. Input data is then communicated to the slave. Likewise, when the slave has a keyboard and/or touch screen, input data is displayed on the slave's screen and is optionally communicated to the master.

FIG. 5 conceptually illustrates a process 500 for master-slave charging and communication in some embodiments of

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the invention. The exact sequence of events and command/information flows depends on whether the master or the slave initiates the communications. The commands are mostly transmitted over the control channel that uses a simpler modulation (e.g. AM, FM) than the data channel (although some embodiments send commands over the data channel). Channel coding is an optional step prior to modulation to improve data transmission and recovery under noisy conditions.

As shown in FIG. 5, the master powers-up (at 505) the slave. The power up is initiated by either the master or by the slave. For instance: (a) the slave makes a request for power (e.g. user presses a button on the slave for power or a low power slave automatically requests to be charged provided it has a battery charge, (b) the slave does not have charge, but the master polls the slave (either regularly or by manually pressing a button on the master) and then the slave requests power (c) the master detects the slave when it gets close to it, polls it and then the slave requests power. In some embodiments, when the master has AC power, the master goes to discovery mode where it polls frequently and goes off. In some embodiments, when a master has battery, the master goes to discovery mode and if it finds no slaves it slowly backs off (for instance going from 1 minute polling interval to 2 minute polling interval, then to 3 minute polling interval, etc.)

Next, slave sends (at 510) request for power. Master receives the slave's request for power, demodulates (at 515) it, and in response generates (at 520) an RF wave. In some implementations the master automatically charges the slave or have some charging rules (e.g. if battery charge of slave is less than 50% then charge slave automatically). In these embodiments, operations 510 and 515 are skipped.

The slave receives the RF wave from the master, and the slave's power generator component converts the RF wave energy to a supply voltage. This is used (at 525) to power-up the slave, charge its battery if it has one, or both. The slave then transmits (at 530) information about itself (or its surrounding if it is a sensor) or makes (at 530) requests. The slave optionally codes the information before modulation in some embodiments. For instance, the slave transmits information such as "I am this particular device", "I have data to be read", "I need to be charged", etc. Active slaves (e.g. cell phones or toys with batteries) use the power of the master instead of their own battery in some embodiments.

The master then receives and demodulates (at 535) the slave's information/request (and decodes if necessary). The master's processing module determines (at 540) whether the master continues the session. When the master determines that the session shall not be continued, the session is stopped (at 545). When the session continues, the master's processing module generates (at 550) commands (e.g. read from memory, write to memory, put into idle energy state, or other specific commands) which are optionally coded and modulated by the master's transceiver and transmitted.

The slave receives the master's signal, demodulates (at 555) the received signal, and decodes the signal if necessary. Next, the slave executes (at 560) the command (e.g. read, write, idle, specific command). In some embodiments, the slave optionally codes (at 565) status information. The slave then modulates (at 565) and transmits (at 565) status information or other requests back to the master (e.g. the read data, write successful status, command successful status, acknowledgements). The master demodulates (at 535) the slave's transmission and its processing module determines if it continues the session (decision to continue is possibly based on the information sent by the slave). In some

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embodiments, the slave's status transmission information includes low battery/charge information or requests for charging (at 565), and the master's processing module processes the information/requests and charges the slave (at 535).

FIG. 6 conceptually illustrates a master with different transmitters for power generation and communication in some embodiments of the invention. One transmitter of each type is shown for simplicity. As shown, the master 605 includes two separate transmitters (possibly with different frequencies) that are used for power generation and communication. The power transmitter 610 performs the function of a dedicated battery for the slaves. In some embodiments the power transmitter has narrow bandwidth but is high power compared to the communication transmitter or more wideband transmitters. A more focused antenna beam and a higher power transmitter increase the power transfer to the slave. The communication transmitter 615 and the power transmitter 610 in some embodiments have different frequencies from while in some embodiments the two transmitters have the same frequencies. In some embodiments, the frequencies are Federal Communications Commission (FCC) approved. The attenuator 620 prevents the transmitter from overloading the receiver 630 and allows the receiver to receive when the communication transmitter transmits. The transceiver's transmitter and receiver use a duplexer 650 that allows bi-directional communication over a single channel and antenna. In some embodiments, the filter 625 is chosen such that it rejects the power frequency but allows the communication frequency. A duplexer or combiner/de-combiner 635 is used with a single antenna 640.

FIG. 7 conceptually illustrates a master and a slave that each includes separate antennas/transceivers for power generation and for communication in some embodiments of the invention. For simplicity, only one antenna/transceiver of each type is shown. As shown, the master 705 includes an antenna 715 and a transceiver 720 for power generation. The master also includes an antenna 725 and a transceiver 730 for communication. Similarly, the slave 710 includes an antenna 735 and a transceiver 740 for power generation and an antenna 745 and a transceiver 750 for communication. Thus, the antenna used for power generation has a directional focused beam pattern and is used with a high frequency to generate power at the slave. The control channel runs on the power transmitter's channel in some embodiments while the control channel runs on the communication transmitter's channel in other embodiments.

FIG. 8 conceptually illustrates a master in some embodiments that uses beam steering to change the direction of the beam when the slave is not directly in front of its beam of the invention. As shown, the master 805 has four antennas 810-825. Slave A 830 is directly in front of antenna 810 and receives most of the energy of the RF beam of that antenna without any steering of the beam. Slave B 835, however, is located at an angle to all of the master's antenna beams. The efficiency of the system is less when the slave is positioned at an angle to the main beam's antenna. However, antenna 810 and 815 use beam steering to target the antenna of slave B 835.

Furthermore, using both antennas 810 and 815 improves efficiency because the power generator of slave B 835 uses the energy simultaneously received from both antennas to generate a supply voltage. Once slave B 835 is powered up it uses one of the antennas for communication (e.g. the antenna with the more reliable signal or the stronger signal). As described by reference to FIG. 1 above, more than one master (either simultaneously or separately) charge a single

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slave (e.g. masters B **115** and C **120** charge slave **6** in FIG. **1**) or several slaves in some embodiments. In some embodiments the masters communicate with each other or alternatively a network server or remote user configures them to change their beam steering and other system parameters such that they maximize power transfer to a single slave or a plurality of slaves.

FIG. **9** conceptually illustrates a multi-antenna RF master in some embodiments of the invention that has a non-conductive spacer material (e.g., plastic) in front of its antenna **915**. This spacer **910** is used to enable the slave **920** to sit on it or get close to it. This creates a separation distance of several wavelengths between the master **905** antennas **915** and the slave **920** antennas **940** so that RF is used for charging. For instance, for a single antenna a separation of two or more wavelengths is needed. For multiple antennas more wavelengths are required, the number of which increases with the number of antennas for optimal beam forming. This could for example be used for wireless charging and wireless USB communication (since each of the master's antennas effectively acts as a USB port that is used for communication as well as charging). Without the separator the slave and the master could be too close to each other because of the short wavelengths of high frequency RF. If the master and the slave are too close to each other, some embodiments use induction charging instead of RF charging. Although FIG. **9** shows one slave antenna and several master antennas, in different embodiments of the invention either the slave or the master has one antenna, many antennas, or one or more antennas with sub-elements. In some embodiments, a slave has a non-conductive spacer material (e.g., plastic) in front of its antenna **940** (not shown) to enable the slave to sit on the master or come close to it.

III. Charging with Induction

FIG. **10** conceptually illustrates a master that uses induction to charge and communicate with a slave in some embodiments of the invention. The master **1005** supplies its primary coil **1010** with an alternating current, thereby creating an AC magnetic field. This magnetic field generates a voltage across the receiver's coil **1015**, which is rectified and smoothed with capacitors (not shown), and used for charging and communication. The power source for the master in different embodiments is an AC source that is converted to DC by an adaptor **1070**, a battery, or other mechanisms (e.g. induction from another master induction charger). A selection switch **1060** in some embodiments selects amongst the different power source options and provides the Vdd to the master's power transmitter. In some embodiments, the power transmitter **1020** uses a Phase Lock Loop (PLL) **1025** that uses a crystal's frequency to synthesize a new frequency. Alternatively, the power generator in some embodiments uses a Direct Digital Frequency Synthesizer (DDFS). The power transmitter then uses a Power Amplifier (PA) **1030** to drive its coil. In the embodiments shown in this figure and the other following figures that illustrate induction, one end of the coil is connected to the PA with the other end grounded. However, some embodiments use a differential coil where the two ends of the coil are connected to the + and - input of the PA. If no modulation is used, the transmitted energy is used to charge a slave through induction of the slave's coil. But if the transmitted signal is modulated (amplitude, frequency, phase or a combination) the signal is also used to transmit data as well as power in some embodiments. In some embodiments, when the transmitter is not sending data it just charges the slave **1035** or the slave communicates back on the same frequency or a close frequency. The slaves use backscattering to send information

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to the master. When the master is in receiving mode, the signal coming from its coil to the receiver is detected. The signal level is adjusted by an attenuator **1040** and a power amplifier **1045**. The detector **1050** then demodulates the signal. The resulting data is then passed on to the processing module **1055** that has a digital signal processing unit, a processor and memory, as well as a networking card (not shown).

FIG. **11** conceptually illustrates a master in some embodiments of the invention that uses the power transmitter for charging, and a separate transmitter for data transmission. Other components of FIG. **11** are similar to FIG. **10**. In some embodiments this data transmitter **1110** functions similar to Near Field Communication (NFC) since NFC also uses induction over very short distances for communication. FIG. **11** shows two separate coils **1115** and **1120** for the power transmitter and the data transmitter respectively. However, some embodiments have one physical coil used for both transmitters, where the power transmitter uses the entire coil and the data transmitter uses all or a smaller section of the same coil. This has the advantage of reducing the number of coils.

FIGS. **10** and **11** show the master with one coil per transmitter. However, in some embodiments the master has a number of coils so that the master charges and communicates with several slaves, or is able to transmit more power. For instance, networked masters in some embodiments have coils that are built-in to conference room tables and marked so that meeting participants can wirelessly charge their devices, connect to each other or to the Intranet/Internet, and transmit/receive information (this also applies to RF beam chargers where RF beam chargers such as master devices shown in FIGS. **2-4** and **6-9** are built-in to conference room tables and marked so that users can wirelessly charge their devices, connect to each other, connect to a networked server or to the Intranet/Internet, and transmit/receive information). Alternatively, the master has the form factor of a light weight pad that is used at home, in the car, on the go, or at work to charge and communicate with a number of devices. Such multi-coil or RF beam masters, tables or pads are smarter in some embodiments and have additional dedicated functions that resemble a small computer. For instance, in some embodiments they have a credit card reader so that users of slaves are not only able to charge their devices but also make payment transactions. Thus, a subset of the coils (or antennas) is dedicated to interface with near field communication (NFC) devices. For example, in some embodiments of the invention phones with NFC capabilities are not only charged but they are also used for contactless payment so that the user places the phone near those coils (or RF beams of a master in the case of RF-based master) in order to get authenticated and transmit payment information to a secured server on the Internet. Alternatively, credit cards in some embodiments have a chip so that they transmit their information to the master device. The users may also choose to enter the payment information manually if they choose to do so. Some of the master's coils (or RF beam of a master in the case of RF-based master) are dedicated and optimized for communication, instead of having all coils be responsible for charging and communication in some embodiments. Likewise, some coils are dedicated and optimized for charging in some embodiments. These multi-coil masters, tables or light-weight portable pads use either a wireline or wireless connection to connect to the Internet, or an Intranet. They use their connection in some embodiments to communicate with a fax/printer for faxing and printing functions. In some embodiments these

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multi-coil masters, tables or light-weight portable pads charge a cell phone and then use the cell phone's networking functions (cellular, WiFi, Bluetooth®) to connect to an Intranet/Internet/server for authentication, web browsing, secure transaction, printing/faxing, etc. In other embodiments a tablet device (such as an iPad®) has a light-weight pad attached to it such that the tablet is wirelessly charged and then become a wireless charger to charge a cell phone. In other embodiments multi-coil masters, tables or light-weight portable pads have photocells to get charged and then charge other devices such as cell phones wirelessly. In yet other embodiments light-weight portable pads have USB or other types of ports for charging and communicating with other devices in a car (both wired or wirelessly). Such pads also have built-in GPS and Wireless LAN functionality in some embodiments.

If a master device has an array of n coils all n coils are used to charge and communicate with one slave in some embodiments, or all n coils are used for a number of slaves in some embodiments. The same channel is used for power transfer and then communication in some embodiments. In some embodiments, every coil has a built-in transceiver. In other embodiments a subset of the coils has built-in transceivers. During a calibration and configuration stage the master and the slave exchange information in order to get to know each other. For example, the master instructs which slaves should be on or off in some embodiments. Frequency and time hopping are coordinated between the master and the slaves in some embodiments for selection amongst a plurality of slaves, as well as additional security. Thus, the master transmits configuration information to the slaves, such as coil frequency and hopping algorithms. The slaves send back acknowledgements or the data to make sure they received it correctly. The slaves also transmit their voltage and current requirements to the master in some embodiments. If a coil at position P at time t has frequency f then it can be represented by (f, t, P) . Frequency hopping is a method where each coil in the matrix of coils is driven by a different frequency f at different time periods. For example coil 1 has frequency f_1 for t_1 seconds, frequency f_2 for t_2 seconds, etc. Time hopping is the process where each coil in the matrix is turned on and off at different time periods.

FIG. 12 conceptually illustrates a master 1205 that has a power transmitter for each of its coils 1210 in some embodiments of the invention. Thus, each coil (or a subset of the coils) has a different frequency to implement frequency hopping. In some embodiments, the master 1205 also makes the power on each transmitter 1215 on and off to have time hopping. Other components of the master (which in different embodiments are similar to components shown in FIG. 10, 11, or 20, or 21) are not shown for simplicity. FIG. 13 conceptually illustrates a master in some embodiments with coils 1310 that have the same frequency and a multiplexer 1315 to activate coils at different times. The PLL 1320 in some embodiments also change the frequency if the master wants to have both frequency and time hopping. Other components of the master are not shown for simplicity.

FIG. 14 conceptually illustrates induction in some embodiments between the master and the slave by using more than one coil on the master or the slave in order to increase power and communication efficiency. Other components of the master (which in different embodiments are similar to components shown in FIG. 10, 11, or 20, or 21) are not shown for simplicity. As shown, the master 1405 includes four coils 1410-1425, slave A 1430 includes two coils 1435-1440, and slave B 1445 includes one coil 1450. As shown in the example of FIG. 14, slave A's two coils

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1435-1440 couple with one coil 1410 on the master 1405. Likewise, the master's coils 1415-1425 couple with slave B's one coil 1450. In the general case in some embodiments X coils on the master couple with Y coils on the slave. In some embodiments, coupled master coils such as 1415-1425 have the same frequency. In other embodiments, the coils have different frequencies f_1 , f_2 and f_3 . In these embodiments, the frequencies are within the bandwidth of the transformer system so that they couple and their power is added together.

In some embodiments, both the master and the slave have a matrix of coils. Different embodiments arrange the coils differently, for instance matrix of coils are arranged in 1D (one line), 2D (a plane), or 3D (multiple planes covering a volume). Some embodiments arrange the coils in different patterns (rectangular grid, triangular grid, circular grid, hexagonal grid, irregular grid, etc). The master then requests the slave's coil patterns. The slave sends it coil pattern to the master. The master then activates a subset of its coils in order to generate a transmit coil pattern that transfers maximum power to the slave. The slave then informs the master how much power each of its coils receives. The master then changes it's transmit coil pattern in order to optimize power transfer to the slave. In some embodiments this process is repeated until optimum power transfer is achieved.

FIG. 15 conceptually illustrates a process 1500 of some embodiments of the invention to change a master device's coil pattern in some embodiments of the invention. As shown, process 1500 receives (at 1505) the slave's coil pattern. Next, the process activates (at 1510) some or all of master coils in order to transmit maximum induction power to the slave's coils.

Next, the process receives (at 1515) information regarding the amount of power each slave coil receives. In different embodiments, the master receives this information from the slave (1) using RFID and backscattering techniques, (2) through RF data transmission from the slave's RF antennas, or (3) through data transmission from one or more of the slave's coils.

The process then determines (at 1520) whether on optimized power transfer is achieved (e.g., when the rate of power transfer satisfies a certain threshold). When the process determines that optimized power transfer is achieved, the process continues (at 1530) induction power transfer using the same coil pattern. The power transfer continues until a set of predetermined criteria (e.g., a certain amount of time elapses a signal is received from the slave, slave's coil impedance changes, etc.). The process then exits.

Otherwise, when the process determines that optimized power transfer is not achieved, the process changes (at 1530) the transmit coil pattern. The process then proceeds to 1515 which was described above.

FIG. 16 conceptually illustrates a multi-coil slave with induction charging in some embodiments of the invention. FIG. 16 shows a general diagram of a slave device 1605 that has M coils 1610. While in some embodiments slave devices have one coil in other embodiment (such as the embodiment shown in FIG. 16) have more than one coil. As shown, a P number of coils are used for power absorption and an N number of coils are used for data communication, where $P \geq M$ and $N \leq M$ and $P+N=M$. The system is reconfigurable so that the numbers P and N are changed so that different numbers of coils are used for power and data communication as needed. When a slave comes close to a master the master detects a change in its load. The master then gives power to the slave. The AC magnetic fields generated by the primary coils of the master charger generate voltages across

the coils of the slave. The power harvester **1615** rectifies and smoothes these voltages and its output are used for charging and power. As shown, the power harvester **1615** is connected to the coils through the front-end switching block **1690**. Initially, a small portion of the circuits, such as the calibration and configuration block **1620**, are turned on with DC power from the power harvester. Then the master uses data modulation or some other modulation method to send configuration information to the slave's calibration and configuration block. This configuration information includes one or more of the master's frequency, master's data and modulation method, and master's identifying information. The slave's calibration and configuration block monitors **1620** the signal before or after the power harvester **1615** and uses the configuration information together with tuning, calibration, and impedance matching of each coil with its rectifier (not shown) to maximize the signal. After the signal is maximized then the slave's calibration and configuration block adjusts a switch **1625** so that power becomes available for the battery **1630** (if the slave has one) and/or other circuits such as the data transceiver **1635** and the processing module **1640**. The battery block **1630** has associated circuitry to measure its parameters and prevent overcharging. The battery block **1630** also includes a regulator and a battery charger unit (not shown) in some embodiments. A voltage converter **1650** is used to provide different voltage levels as required by the different slave modules. The slave in some embodiments also has a power management module **1655** to increase the battery life of the device.

In some embodiments the slave stores identifying information about masters (or networked servers) that are authorized to charge it. This is stored either in the slave's calibration and configuration block or the slave's memory (not shown). The slave checks the configuration information sent from the master to the slave for the master's identifying information. If the information is not included the slave requests it. The slave then checks this information with the authorized list and if there is not a match the slave's calibration and configuration block disables charging and/or power-up by controlling the position of the switch.

The slave's data transceiver **1635** is reconfigurable so that K transmitters **1665** and P receivers **1670** are used. For instance, more than one transmitter in some embodiments is used to drive a single coil. Likewise, more than one receiver in some embodiments is used to receive from a single coil. In some embodiments, a master device has a similar configuration. If the slave is only charging its battery, once the battery is charged the slave in some embodiments disables its coil(s) or changes its impedance so that the master knows the slave does not need more power for charging. During data communication the load modulation unit **1660** modulates the load for the coils. When the load on the slave's coils changes then the system acts like a transformer and the same effect is shown on the transmitter's coils through coupling. The changes required to implement this system can be incorporated into the battery pack of most electronics systems (conventional battery packs typically include rechargeable batteries that use AC power adapters. These battery packs could be changed to include the components of FIG. **16** instead).

The slave in some embodiments optionally has sensors **1675** with electronic circuitry. Once the slave is powered up the sensors perform their sensing functions and communicate their data to the induction charger, another master, or a network server. Some examples of sensors are temperature, gyrotator, pressure, and heart monitor. The master and the slave in some embodiments optionally have a touch screen

and/or keyboard for entering data which is displayed on the screen and/or communicated, respectively, to the slave and the master.

FIG. **17** conceptually illustrates a process **1700** for reconfiguring coils of a slave device in some embodiments of the invention. As shown, the slave optionally receives (at **1705**) induction power for a certain period of time from the master to power up some or all of the slave's circuitries. In some embodiments, when the slave initially has more than a certain amount of power, operation **1705** is skipped.

Next, the process receives (at **1710**) configuration information from the master. The master configuration information includes one or more of the master's operating parameters such as the operating wireless communication frequency of the master (which is used for communication between the master and slave), master's data and modulation method, and master's identifying information. The process then reconfigures (at **1715**) the slave's coils by using the received configuration information and one or more tuning, calibration, and impedance matching to maximize the received induction power. Coarse calibration and fine tuning are performed in some embodiments to ensure that all elements on the master and slave have the same frequency and are tuned for it. Likewise, impedance matching is performed in some embodiments such that the master and the slave are matched for communication. The process then receives (at **1720**) induction power from the master device until the generated power in the slave reaches a certain threshold. The process then exits.

FIG. **18** conceptually illustrates a process **1800** for terminating power generation in the slave in some embodiments of the invention. As shown, the process receives (at **1800**) power through the induction. Next, the process determines whether enough power is generated to satisfy a certain threshold. For instance, the process determines whether a battery or a capacitor in the slave is charged to a certain voltage level.

When the generated power does satisfy the threshold, the process proceeds to **1805** to continue receiving power through induction. Otherwise, the process either disables the coils (e.g., by turn a switch on or off) or changes the coils impedances as a signal to the master device to stop transmitting induction power. The process then exits. Some embodiments use a similar process to terminate generation of power through conversation of RF energy using a similar process as process **1800**. In some of these embodiments, the slave's voltage converter **477** is disconnected from the slave's power generator **473** antennas is disconnected from the slave's power transceiver. In other embodiments, the slave's antennas **499** are turned off.

FIG. **19** conceptually illustrates a process **1900** for configuring the slave's coils for either power generation or data transmission in some embodiments of the invention. As shown, the process configures (at **1905**) slave's coils to use some or all of the coils for receiving power through induction and some or none of the coils for data transmission.

Next, the process receives (at **1910**) power through induction at the slave's coils. Next, the process determines (at **1915**) whether enough power is generated at the slave to satisfy a certain threshold. For instance, the process determines whether a battery or a capacitor in the slave is charged to a certain voltage level. When the generated power has not satisfied the threshold, the process proceeds to **1910** to receive more induction power. Otherwise, the process reconfigures the coils that are used for power generation and data transmission. For instance, when the power in slave reaches a maximum threshold, no coils are used for power genera-

tion and some or all coils are used for data transmission. As another example, when the power reaches a certain threshold, the number of coils used for data transmission is increased and the number of coils used for power generation is decreased. In this example, power generation through induction continues until the power level reaches a maximum threshold.

IV. Charging with Both RF and Induction in a Hybrid Configuration

Although the embodiments discussed by reference to FIGS. 1-19 described masters with either coils or RF antennas, the invention is not restricted to these embodiments. Specifically, in some embodiments, both the master and the slave have induction coils and RF antennas.

For instance, in some embodiments a master as shown in FIGS. 1-4 and 6-9 in addition to RF antennas has coils and associated circuitry as shown to any of FIGS. 10-14. Also, in some embodiments a slave as shown in FIGS. 1-4 and 7 in addition to RF antennas has coils and associated circuitry as shown in FIGS. 12-16. Because the induction frequency and RF frequencies are far apart, each element (i.e. each master and slave element) is calibrated to have two different operating frequencies, one for induction and one for RF.

FIG. 20 conceptually illustrates a hybrid system of some embodiments of the invention where the master uses an induction charger as a power source to power itself and then uses a high frequency directional and focused RF beam to power up one or more slave devices and communicate with them. As shown, the master 2005 includes a rechargeable power supply 2010, a power harvester 2015 and a coil 2020. The induction charger 2025 has a power source (AC power, battery, etc). The power is connected to the induction charger's power transmitter 2035 (e.g., after an AC source is converted to DC through an adaptor 2080), which is connected to a primary coil 2040 with a reference ground point 2045. When the master's secondary coil is close to the charger's primary coil it receives power through inductance and its power harvester 2015 charges the master's rechargeable power supply 2010. The master then uses a high frequency directional RF beam to power up one or more slave devices 2050 (or charge the slave device's battery if it has one) and communicates with it, as discussed by reference to FIG. 2-4. FIG. 20 shows only one embodiment of induction charging, and there are other implementations and methods as discussed herein.

FIG. 21 conceptually illustrates a master in some embodiments of the invention that acts as an induction charger and uses induction to charge the slave before using its high frequency directional beam to communicate with the slave. The master 2105 has access to power (AC power or battery). The master's power is connected to a power transmitter 2110 that uses a multiplexer 2115 to power a matrix of coils 2120. This is similar to the arrangement shown in FIG. 13, although each coil or a subset of coils may also have their own individual power transmitters (as in FIG. 12). The slave 2125 includes a voltage converter 2130, a rechargeable power supply 2135, a power harvester 2140, a matrix of coils 2145 and other blocks of FIG. 16 that are not shown for simplicity (e.g. calibration and configuration block). When the master's primary coils are close to the slave's coils the slave receives power through inductance. The master then uses a high frequency directional RF beam to communicate with the slave. FIG. 21 shows only one embodiment of induction charging, and there are other implementations and methods as discussed herein.

FIG. 22 conceptually illustrates two slaves in some embodiments of the invention that use the power of a

master's coils to power up or charge their batteries and then communicate with each other using their communication transceivers. As shown, the two slaves 2205 and 2210 are placed on or near a master 2215 induction charger. An example of such an embodiment (without any limitations) is: slave A 2205 is a cell phone, slave 2210 is a memory stick with data, and the master is a PC with an induction pad. The two slaves use the power of the master's coils 2220 to power-up or charge their batteries (not shown). The two slaves then use their RF transceiver (not shown) with directional beams (or any other communication transceiver) to communicate directly with each other. In other embodiments, the two slaves use the master and induction coupling to communicate with each other. For instance, where one or both of the slaves do not have an RF communication transceiver and slave A wants to communicate with slave B, Slave A uses induction coupling with the master to send its request for slave B to the master. The master uses induction coupling to communicate that request to slave B. Slave B then uses induction coupling to reply to the master, and the master uses induction coupling to forward the reply to slave A. In some embodiments more than two slaves get charged and communicate with each other. A network server 2225 in some embodiments controls the master and the slaves through a network 2230.

The description so far has discussed induction charging and focused RF beam as separate embodiments. FIG. 21 did discuss a master that uses induction for charging and RF for communication. That role is reversed in some embodiments of the invention where RF is used for charging and induction is used for communication. But it is possible to view the coil and the RF antennas as elements. In some embodiments one element is designed for the master, slave or both so that at low frequencies the element is like a coil inductor and at high frequencies it is like an antenna. This means that at the same time one has RF power and induction power. Low frequencies mean big coils and high frequencies mean small coils. If the distance is far enough (e.g., more than 2-3 wavelengths) compared to the signal wavelength then waves are created and the element is used for RF. If the distance is short then waves cannot be created and it will be more like induction. So distance is used to select one mode or the mode is chosen automatically. In other embodiments the master, slave or both have two different elements for different distances (one for short distances and one for far distances). In these embodiments, the master does time multiplexing between the two or select one over the other. This depends on the slave and whether it has each element for induction and RF antenna. If the master is charging and communicating with a group of antennas then the selection of induction or RF depends on the configuration of the slaves as to which ones have induction, antenna or both.

FIG. 23 conceptually illustrates an element 2300 in some embodiments of the invention that is designed to be a single coil 2305 at low frequencies and a multiple antenna sub-elements 2310 at high frequencies with beam forming capabilities. The element in some embodiments physically resembles a coil. In some embodiments, the length of the coil is much bigger than the size of antenna required for RF at high frequencies. For instance in the frequency range of 50-60 GHz the element is of the order of centimeters, whereas the antenna sub-elements are of the order of millimeters. The element is divided into multiple RF antennas sub-elements and these multiple antenna sub-elements are used to do beam forming. Each sub-element is of the order of half a wavelength or less and operates at two separate frequencies, one lower frequency for the coil 2305 and one

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higher frequency for the antenna **2310**. Each sub-element has an associated port **2315** that is frequency dependent (e.g., a capacitor or an LC circuit) such that at high frequency the sub-element acts as an antenna, but at low frequencies the sub-elements act as one connected coil. In FIG. **23**, these ports **2315** are not shown for the low frequency operation to emphasize that the element **2300** acts as a single coil **2305** in low frequencies. All of the discussions throughout this specification regarding slave and master configuration and control and communication apply to embodiments that use the element shown in FIG. **23**. For instance, in some embodiments, the element is used in one or more of the master and slave devices shown in FIGS. **1-4**, **6-14**, **16**, and **20-22**. Also, one of the antennas **2300** is used for control and communication in some embodiments. In other embodiments, all antennas are used for control, communication and power. If low frequency and high frequency are used at the same time the communication channel in some embodiments is RF or induction or both.

V. Computer System

Many of the above-described processes and modules are implemented as software processes that are specified as a set of instructions recorded on a computer readable storage medium (also referred to as “computer readable medium” or “machine readable medium”). These instructions are executed by one or more computational elements, such as one or more processing units of one or more processors or other computational elements like Application-Specific ICs (“ASIC”) and Field Programmable Gate Arrays (“FPGA”). The execution of these instructions causes the set of computational elements to perform the actions indicated in the instructions. Computer is meant in its broadest sense, and can include any electronic device with a processor (e.g., moving scanner, mobile device, access point, etc.). Examples of computer readable media include, but are not limited to, CD-ROMs, flash drives, RAM chips, hard drives, EPROMs, etc. The computer readable media does not include carrier waves and/or electronic signals passing wirelessly or over wired connection.

In this specification, the term “software” includes firmware residing in read-only memory or applications stored in magnetic storage that can be read into memory for processing by one or more processors. Also, in some embodiments, multiple software inventions can be implemented as parts of a larger program while remaining distinct software inventions. In some embodiments, multiple software inventions can also be implemented as separate programs. Finally, any combination of separate programs that together implement a software invention described herein is within the scope of the invention. In some embodiments, the software programs when installed to operate on one or more computer systems define one or more specific machine implementations that execute and perform the operations of the software programs.

FIG. **24** conceptually illustrates a computer system **2400** with which some embodiments of the invention are implemented. For example, the masters, slaves, network servers, access points, and processes described above by reference to FIGS. **1-23** may be at least partially implemented using sets of instructions that are run on the computer system **2400**.

Such a computer system includes various types of computer readable mediums and interfaces for various other types of computer readable mediums. Computer system **2400** includes a bus **2410**, at least one processing unit (e.g., a processor) **2420**, a system memory **2430**, a read-only memory (ROM) **2440**, a permanent storage device **2450**, input devices **2470**, output devices **2480**, and a network

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connection **2490**. The components of the computer system **2400** are electronic devices that automatically perform operations based on digital and/or analog input signals. The various examples of user inputs described above may be at least partially implemented using sets of instructions that are run on the computer system **2400** and displayed using the output devices **2480**.

One of ordinary skill in the art will recognize that the computer system **2400** may be embodied in other specific forms without deviating from the spirit of the invention. For instance, the computer system may be implemented using various specific devices either alone or in combination. For example, a local Personal Computer (PC) may include the input devices **2470** and output devices **2480**, while a remote PC may include the other devices **2410-2450**, with the local PC connected to the remote PC through a network that the local PC accesses through its network connection **2490** (where the remote PC is also connected to the network through a network connection).

The bus **2410** collectively represents all system, peripheral, and chipset buses that communicatively connect the numerous internal devices of the computer system **2400**. In some cases, the bus **2410** may include wireless and/or optical communication pathways in addition to or in place of wired connections. For example, the input devices **2470** and/or output devices **2480** may be coupled to the system **2400** using a wireless local area network (W-LAN) connection, Bluetooth®, or some other wireless connection protocol or system.

The bus **2410** communicatively connects, for example, the processor **2420** with the system memory **2430**, the ROM **2440**, and the permanent storage device **2450**. From these various memory units, the processor **2420** retrieves instructions to execute and data to process in order to execute the processes of some embodiments. In some embodiments the processor includes an FPGA, an ASIC, or various other electronic components for execution instructions.

The ROM **2440** stores static data and instructions that are needed by the processor **2420** and other modules of the computer system. The permanent storage device **2450**, on the other hand, is a read-and-write memory device. This device is a non-volatile memory unit that stores instructions and data even when the computer system **2400** is off. Some embodiments of the invention use a mass-storage device (such as a magnetic or optical disk and its corresponding disk drive) as the permanent storage device **2450**.

Other embodiments use a removable storage device (such as a floppy disk, flash drive, or CD-ROM) as the permanent storage device. Like the permanent storage device **2450**, the system memory **2430** is a read-and-write memory device. However, unlike storage device **2450**, the system memory **2430** is a volatile read-and-write memory, such as a random access memory (RAM). The system memory stores some of the instructions and data that the processor needs at runtime. In some embodiments, the sets of instructions and/or data used to implement the invention’s processes are stored in the system memory **2430**, the permanent storage device **2450**, and/or the read-only memory **2440**. For example, the various memory units include instructions for processing multimedia items in accordance with some embodiments.

The bus **2410** also connects to the input devices **2470** and output devices **2480**. The input devices **2470** enable the user to communicate information and select commands to the computer system. The input devices include alphanumeric keyboards and pointing devices (also called “cursor control devices”). The input devices also include audio input devices (e.g., microphones, MIDI musical instruments, etc.)

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and video input devices (e.g., video cameras, still cameras, optical scanning devices, etc.). The output devices 2480 include printers, electronic display devices that display still or moving images, and electronic audio devices that play audio generated by the computer system. For instance, these display devices may display a graphical user interface (GUI). The display devices include devices such as cathode ray tubes (“CRT”), liquid crystal displays (“LCD”), plasma display panels (“PDP”), surface-conduction electron-emitter displays (alternatively referred to as a “surface electron display” or “SED”), etc. The audio devices include a PC’s sound card and speakers, a speaker on a cellular phone, a Bluetooth® earpiece, etc. Some or all of these output devices may be wirelessly or optically connected to the computer system.

Finally, as shown in FIG. 24, bus 2410 also couples computer 2400 to a network 2490 through a network adapter (not shown). In this manner, the computer can be a part of a network of computers (such as a local area network (“LAN”), a wide area network (“WAN”), an Intranet, or a network of networks, such as the Internet. For example, the computer 2400 may be coupled to a web server (network 2490) so that a web browser executing on the computer 2400 can interact with the web server as a user interacts with a GUI that operates in the web browser.

As mentioned above, some embodiments include electronic components, such as microprocessors, storage and memory that store computer program instructions in a machine-readable or computer-readable medium (alternatively referred to as computer-readable storage media, machine-readable media, or machine-readable storage media). Some examples of such computer-readable media include RAM, ROM, read-only compact discs (CD-ROM), recordable compact discs (CD-R), rewritable compact discs (CD-RW), read-only digital versatile discs (e.g., DVD-ROM, dual-layer DVD-ROM), a variety of recordable/rewritable DVDs (e.g., DVD-RAM, DVD-RW, DVD+RW, etc.), flash memory (e.g., SD cards, mini-SD cards, micro-SD cards, etc.), magnetic and/or solid state hard drives, read-only and recordable blu-ray discs, ultra density optical discs, any other optical or magnetic media, and floppy disks. The computer-readable media may store a computer program that is executable by a device such as an electronics device, a microprocessor, a processor, a multi-processor (e.g., an IC with several processing units on it) and includes sets of instructions for performing various operations. The computer program excludes any wireless signals, wired download signals, and/or any other ephemeral signals.

Examples of hardware devices configured to store and execute sets of instructions include, but are not limited to, ASICs, FPGAs, programmable logic devices (“PLDs”), ROM, and RAM devices. Examples of computer programs or computer code include machine code, such as produced by a compiler, and files including higher-level code that are executed by a computer, an electronic component, or a microprocessor using an interpreter.

As used in this specification and any claims of this application, the terms “computer”, “computer system”, “server”, “processor”, and “memory” all refer to electronic or other technological devices. These terms exclude people or groups of people. For the purposes of this specification, the terms display or displaying mean displaying on an electronic device. As used in this specification and any claims of this application, the terms “computer readable medium”, “computer readable media”, “machine readable medium”, and “machine readable media” are entirely restricted to non-transitory, tangible, physical objects that

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store information in a form that is readable by a computer. These terms exclude any wireless signals, wired download signals, and/or any other ephemeral signals.

It should be recognized by one of ordinary skill in the art that any or all of the components of computer system 2400 may be used in conjunction with the invention. Moreover, one of ordinary skill in the art will appreciate that any other system configuration may also be used in conjunction with the invention or components of the invention.

While the invention has been described with reference to numerous specific details, one of ordinary skill in the art will recognize that the invention can be embodied in other specific forms without departing from the spirit of the invention. Moreover, while the examples shown illustrate many individual modules as separate blocks, one of ordinary skill in the art would recognize that some embodiments may combine these modules into a single functional block or element. One of ordinary skill in the art would also recognize that some embodiments may divide a particular module into multiple modules. Furthermore, specific details (such as details shown in FIGS. 1-23) are given as an example and it is possible to use different circuit implementations to achieve the same results without deviating from the teachings of the invention. The words “embodiment” and “embodiments” are used throughout this specification to refer to the embodiments of the current invention.

One of ordinary skill in the art would understand that the invention is not to be limited by the foregoing illustrative details, but rather is to be defined by the appended claims.

What is claimed is:

1. A master device for wirelessly providing power to a set of slave devices, the master device comprising:

a power transmitter configured to wirelessly provide power to the set of slave devices;

the master device configured to:

receive an identification of each slave device in the set of slave devices;

compare the identification received from each of the slave devices with identifications of slave devices stored in a database, the database storing identification of slaves devices that are authorized to wirelessly receive power from the master device; and wirelessly provide, utilizing the power transmitter, power to one or more slave devices in the set of slave devices having an identification that matches the identification of an authorized slave device stored in the database.

2. The master device of claim 1 further comprising a directional antenna to direct radio frequency (RF) energy to an antenna of each slave device for conversion of the RF energy to power by the slave device.

3. The master device of claim 2, wherein the RF energy is an RF beam directed to the antenna of the slave device.

4. The master device of claim 1 further comprising a coil, wherein wirelessly providing power to one or more slave devices comprises:

receiving alternating power at the coil of the master device from the power transmitter; and transmitting energy by induction from the coil of the master device to a coil of each of said one or more slave devices for conversion of the inducted energy to power by the slave device.

5. The master device of claim 1 further configured to: monitor a power status of the set of slave devices; determine which slave devices gets charged; and determine charging priorities of the slave devices being charged.

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6. A method for use by a master device for wirelessly providing power to a set of slave devices, the method comprising:

receiving an identification of each slave device in the set of slave devices;

comparing the identification received from each of the slave devices with identifications of slave devices stored in a database, the database storing identification of slaves devices that are authorized to wirelessly receive power from the master device; and

wirelessly providing power to one or more slave devices in the set of slave devices having an identification that matches the identification of an authorized slave device stored in the database.

7. The method of claim 6, the master device further comprising a directional antenna, the method further comprising directing radio frequency (RF) energy to an antenna of each slave device for conversion of the RF energy to power by the slave device.

8. The method of claim 7, wherein the RF energy is an RF beam directed to the antenna of the slave device.

9. The method of claim 6, the master device further comprising a coil, wherein wirelessly providing power to one or more slave devices comprises:

receiving alternating power at the coil of the master device from the power transmitter; and

transmitting energy by induction from the coil of the master device to a coil of each of said one or more slave devices for conversion of the inducted energy to power by the slave device.

10. The method of claim 6 further comprising: monitoring a power status of the set of slave devices; determining which slave devices gets charged; and determining charging priorities of the slave devices being charged.

11. A slave device for wirelessly receiving energy from a master device, the slave device comprising:

a set of electronic circuitry; and

a converter configured to generate power from the energy wirelessly received from the master device for use by the set of electronic circuitry;

the slave device configured to:

transmit a slave device identification to the master device for determining authorization to wirelessly receive energy from the master device;

wirelessly receive, in response to transmitting the slave device identification to the master device, energy from the master device; and

generate, using the converter, power from the wireless energy received from the master device for use by the set of electronic circuitry of the slave device.

12. The slave device of claim 11 further configured to: store identifying information of a set of master devices that are authorized to wirelessly provide energy to the slave device; and

allow the converter to generate power from the energy wirelessly received from a master device only when an identifying information received from the master device matches the identifying information of a master device from the set of authorized master devices.

13. The slave device of claim 11 further comprising an antenna to receive radio frequency (RF) energy from a directional antenna of the master device to convert the RF energy to power by the slave device.

14. The slave device of claim 13, wherein the RF energy is an RF beam directed by a directional antenna of the master device to the antenna of the slave device.

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15. The slave device of claim 11 further comprising a coil, wherein wirelessly receiving energy from the master device comprises receiving energy by induction from a coil of the master device at the coil of the slave device to convert the inducted energy to power by the slave device.

16. The slave device of claim 11 further comprising a capacitor, the converter of the slave device further configured to store the converted power in the capacitor.

17. The slave device of claim 11 further comprising a battery, the converter of the slave device further configured to use the converted power to charge the battery of the slave device.

18. The slave device of claim 11 further comprising:

a battery;

a capacitor;

a switch connected to the battery, the capacitor, and the converter; and

a controller configured to adjust a position of the switch to connect the converter to (i) the capacitor, (ii) the battery, or (iii) both the capacitor and the battery.

19. A method for use by a slave device for generating power from energy wirelessly received from a master device, the method comprising:

transmitting a slave device identification to the master device for determining authorization to wirelessly receive energy from the master device;

wirelessly receiving, in response to transmitting the slave device identification to the master device, energy from the master device; and

generating power from the wireless energy received from the master device for use by a set of electronic circuitry of the slave device.

20. The method of claim 19 further comprising:

storing, by the slave device, identifying information of a set of master devices that are authorized to wirelessly provide energy to the slave device; and

allowing the converter to generate power from the energy wirelessly received from a master device only when an identifying information received from the master device matches the identifying information of a master device from the set of authorized master devices.

21. The method of claim 19, the slave device further comprising an antenna to receive radio frequency (RF) energy from a directional antenna of the master device to convert the RF energy to power by the slave device.

22. The method of claim 20, wherein the RF energy is an RF beam directed by a directional antenna of the master device to the antenna of the slave device.

23. The method of claim 19, the slave device further comprising a coil, wherein wirelessly receiving energy from the master device comprises receiving energy by induction from a coil of the master device at the coil of the slave device to convert the inducted energy to power by the slave device.

24. The method of claim 19, the slave device further comprising a capacitor, the method further comprising storing the converted power in the capacitor.

25. The method of claim 19, the slave device further comprising a battery, the method further comprising using the converted power to charge the battery of the slave device.

26. The method of claim 19, the slave device further comprising a battery, a capacitor, and a switch connected to the battery, the capacitor, and the converter, the method further comprising adjusting a position of the switch to connect the converter to (i) the capacitor, (ii) the battery, or (iii) both the capacitor and the battery.

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27. A master device for wirelessly charging a slave device, the master device comprising:

a memory storing a first identifying information of the slave device;

a processor configured to:

receive a second identifying information from the slave device; and

compare the second identifying information received from the slave device with the first identifying information of the slave device stored in the memory to determine a match; and

a power transmitter configured to:

provide power wirelessly to the slave device for wirelessly charging the slave device when the processor determines the match between the second identifying information and the first identifying information.

28. The master device of claim 27, wherein the power transmitter is configured to wirelessly provide power using RF beams.

29. The master device of claim 27, wherein the power transmitter is configured to wirelessly provide power using non-resonant induction.

30. The master device of claim 27, wherein the power transmitter is configured to wirelessly provide power using resonant induction.

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31. A method for use by a master device for wirelessly charging a first device, the master device including a processor, a power transmitter and a memory storing a first identifying information of the slave device, the method comprising:

receiving, using the processor, a second identifying information from the slave device;

comparing, using the processor, the second identifying information received from the slave device with the first identifying information of the slave device stored in the memory to determine a match; and

providing power wirelessly to the slave device, using the power transmitter, for wirelessly charging the slave device when the comparing, using the processor, determines the match between the second identifying information and the first identifying information.

32. The method of claim 31, wherein the providing power wirelessly to the first slave device provides power using RF beams.

33. The method of claim 31, wherein the providing power wirelessly to the first slave device provides power using non-resonant induction.

34. The method of claim 31, wherein the providing power wirelessly to the first slave device provides power using resonant induction.

* * * * *

EXHIBIT 2

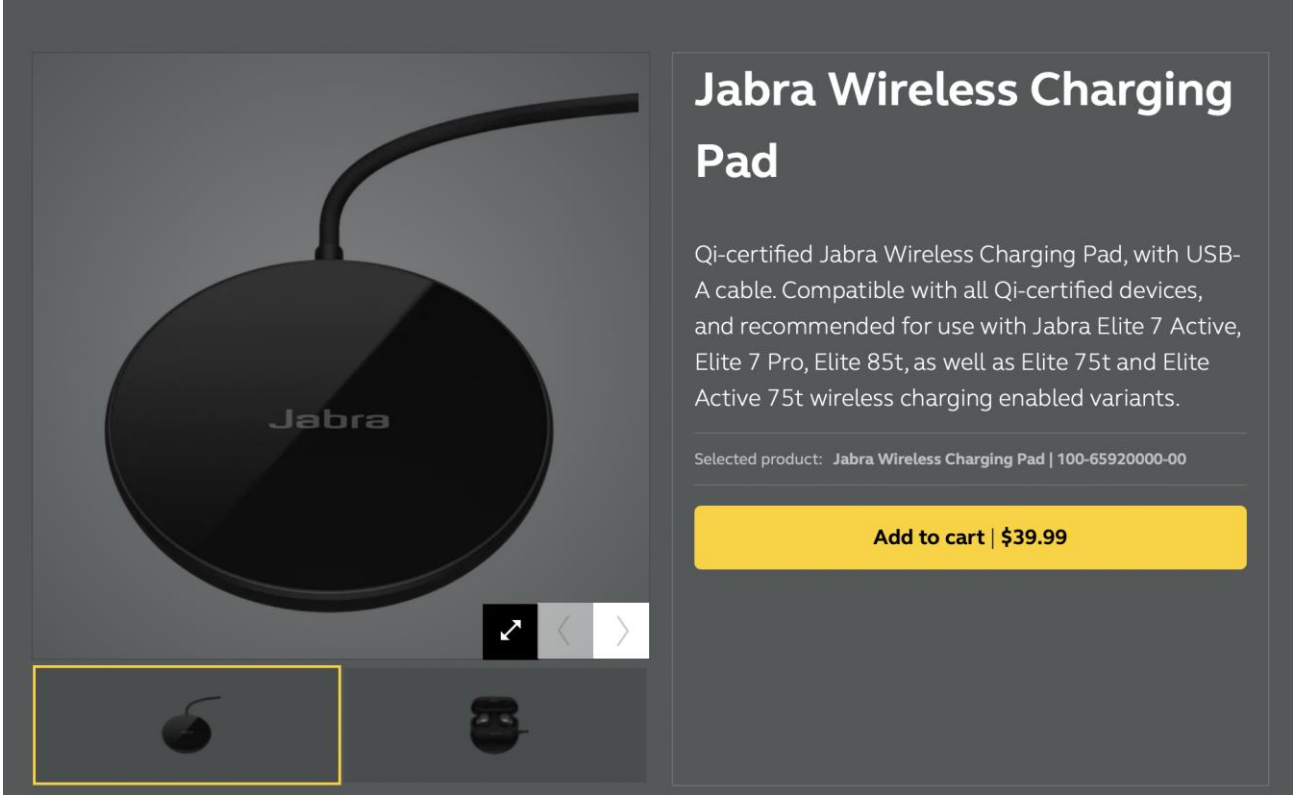
US9608472	Jabra Wireless Charging Pad ("The accused product")
<p>19. A method for use by a slave device for generating power from energy wirelessly received from a master device, the method comprising:</p>	<p>The accused product practices a method for use by a slave device (e.g., device to be charged) for generating power from energy wirelessly received from a master device (e.g., the accused product).</p>  <p>https://www.jabra.com/accessories/jabra-wireless-charging-pad##100-65920000-00</p>

EXHIBIT 2

JABRA WIRELESS CHARGING PAD (5190003)**BRAND**

Jabra

PRODUCT NAME

Wireless Charging Pad

MANUFACTURER PART NUMBER

5190003

PRODUCT TYPE

Power Class 0 Transmitter

REGISTRATION DATE

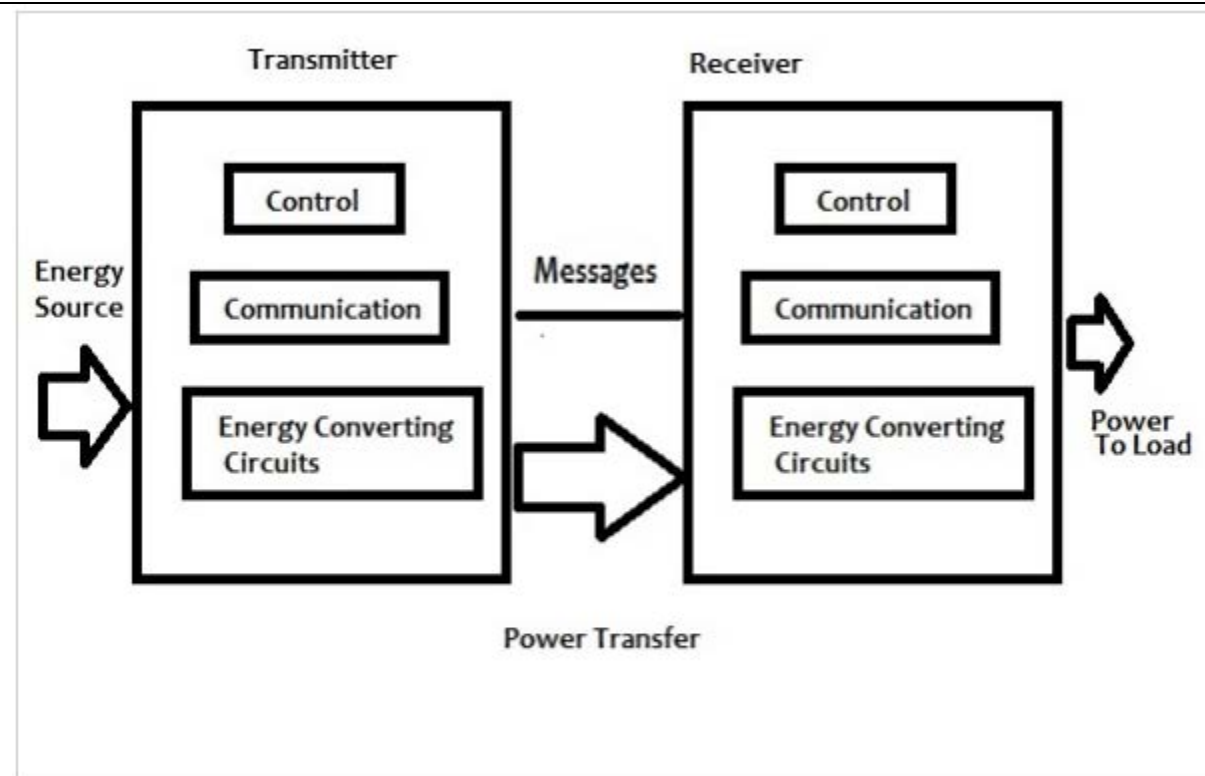
January 13, 2022

**ADDITIONAL DETAILS**

Qi Registration id	12441
Version	1.2.4
Currently licensed	Yes
Power profile	Basic Power Profile
Transmitter design	A11a
Automotive Charger for inline assembly	No
Compliant Automotive Guidelines	No
Evaluation module	No
Potential power level	5 watts
Subsystem for integration in other products	No

<https://www.wirelesspowerconsortium.com/products/12441>

EXHIBIT 2



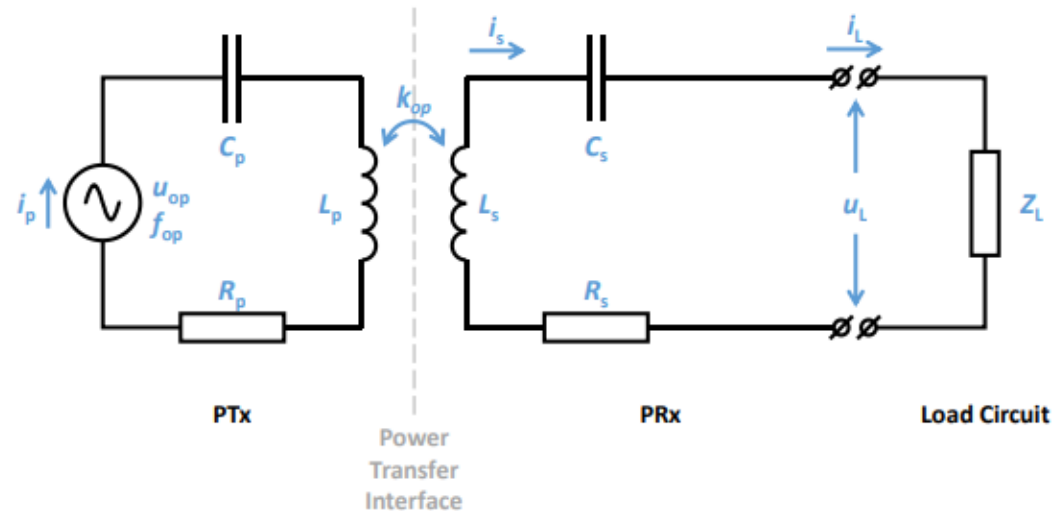
WPT transmitter/receiver block diagram.

<https://www.allaboutcircuits.com/technical-articles/introduction-to-wireless-power-transfer-wpt/>

EXHIBIT 2

Figure 10 illustrates a simplified model of the system comprising a Power Transmitter on the left and a Power Receiver on the right. For clarity, the load circuit is drawn separately from the Power Receiver. The Power Transmitter consists of a power source (u_{op}, f_{op}), a capacitance C_p , an inductance L_p , and a resistance R_p . The power source supplies a sinusoidal voltage u_{op} at a frequency f_{op} . The Power Receiver consists of a capacitance C_s , an inductance L_s , and a resistance R_s . A load having an impedance Z_L is connected to the output terminals of the Power Receiver. The symbols u_L , i_L , i_p , and k_{op} represent the load voltage, load current, Primary Coil current, and coupling factor.

Figure 10. Simplified system model



Source: *Qi Wireless Power Transfer System Specification.pdf*

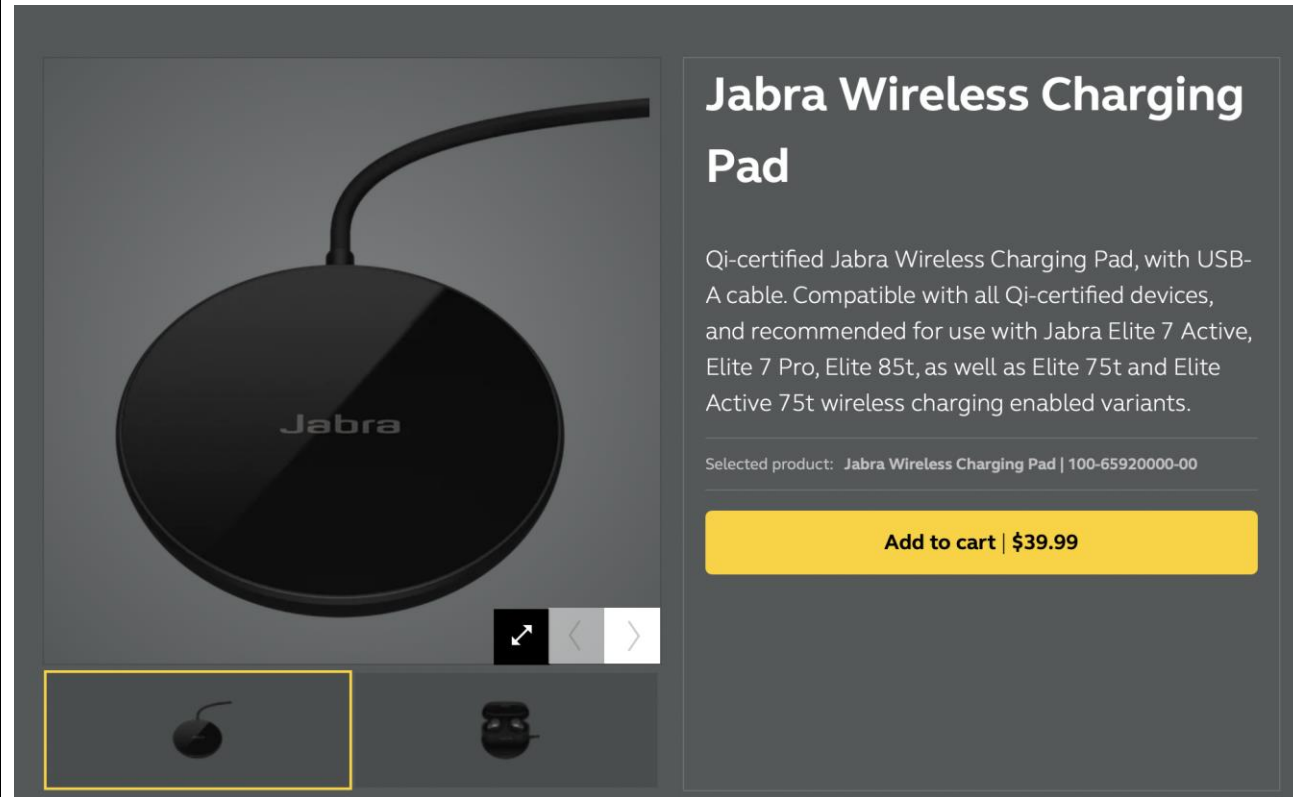
transmitting a slave device identification to the master device for determining authorization to wirelessly

The accused product practices transmitting a slave device identification (e.g., identification of the device to be charged) to the master device (e.g., the accused product) for determining authorization to wirelessly receive energy (e.g., wireless power transfer) from the master device (e.g., the accused product).

EXHIBIT 2

receive energy from the master device;

The accused product follows Qi-Standard. The device to be charged acts as a power receiver and the accused product acts as a power transmitter. The power receiver sends an identification to power transmitter for identification and verification. The power receiver receives an ACK response for successful verification and NAK response for unsuccessful verification.



<https://www.jabra.com/accessories/jabra-wireless-charging-pad##100-65920000-00>

EXHIBIT 2

JABRA WIRELESS CHARGING PAD (5190003)**BRAND**

Jabra

PRODUCT NAME

Wireless Charging Pad

MANUFACTURER PART NUMBER

5190003

PRODUCT TYPE

Power Class 0 Transmitter

REGISTRATION DATE

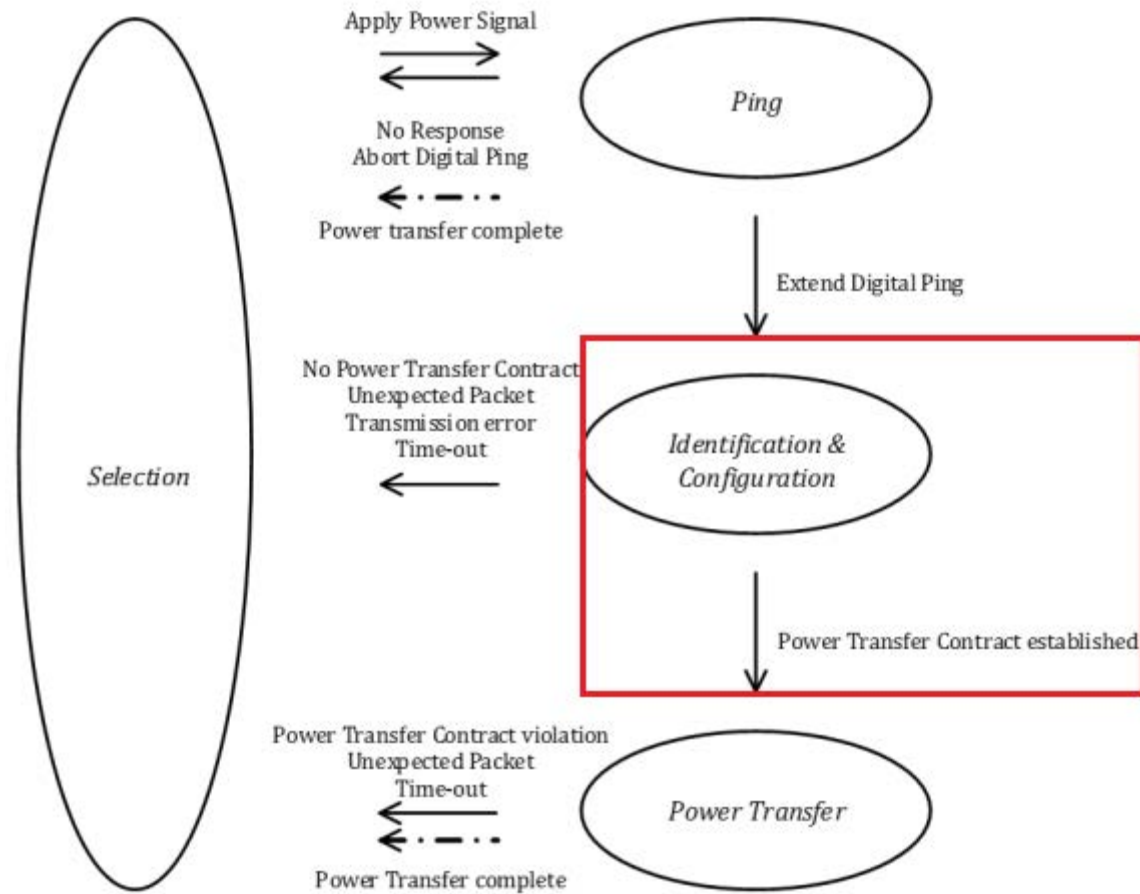
January 13, 2022

**ADDITIONAL DETAILS**

Qi Registration id	12441
Version	1.2.4
Currently licensed	Yes
Power profile	Basic Power Profile
Transmitter design	A11a
Automotive Charger for inline assembly	No
Compliant Automotive Guidelines	No
Evaluation module	No
Potential power level	5 watts
Subsystem for integration in other products	No

<https://www.wirelesspowerconsortium.com/products/12441>

EXHIBIT 2

Figure 16. Power transfer phases—Baseline Power Profile

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

identification & configuration In this phase, the Power Transmitter identifies the selected Power Receiver, and obtains configuration information such as the maximum amount of power that the Power Receiver intends to provide at its output. The Power Transmitter uses this information to create a Power Transfer Contract. This Power Transfer Contract contains limits for several parameters that characterize the power transfer in the *power transfer* phase. At any time before proceeding to the *power transfer* phase, the Power Transmitter may decide to terminate the extended Digital Ping (for example, to discover additional Power Receivers). This reverts the system to the *selection* phase.

Source: *Qi Wireless Power Transfer System Specification.pdf*

5.1.3.3 Identification & configuration phase (PRx perspective)

In the identification & configuration phase, the Power Receiver shall transmit the following sequence of Packets:

- If the Power Receiver enters the *identification & configuration* phase from the *ping* phase, an Identification Packet.
- If the Ext bit of the preceding Identification Packet is set to ONE, an Extended Identification Packet.
- Up to 7 optional configuration Packets from the following set (the order in which the Power Receiver transmits these Packets, if any, is not relevant):
 - A Power Control Hold-off Packet. The Power Control Hold-off Time t_{delay} contained in this Packet shall satisfy the relation $t_{\text{delay}}^{(\min)} \leq t_{\text{delay}} \leq t_{\text{delay}}^{(\max)}$. See Table 10.
 - Any Proprietary Packet (as listed in Table 26).
 - A Configuration Packet.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

5.2.3.8 Identification Packet (0x71)

Table 35 defines the format of the message contained in an Identification Packet.

Table 35. Identification

	b₇	b₆	b₅	b₄	b₃	b₂	b₁	b₀
B₀	Major Version				Minor Version			
B₁	(MSB) <div>Manufacturer Code</div> (LSB)							
B₂								
B₃	Ext	(MSB) <div><u>Basic Device Identifier</u></div> (LSB)						
⋮								
B₆								

Ext

- If this bit is set to ZERO, the bit string

Manufacturer Code || Basic Device Identifier

identifies the Power Receiver.

- If this bit is set to ONE, the bit string

Manufacturer Code || Basic Device Identifier || Extended Device Identifier

identifies the Power Receiver (see Section 0).

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

Basic Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. A Power Receiver manufacturer should ensure that the combination of Basic Device Identifier and Manufacturer ID is sufficiently unique. Embedding a serial number of at least 20 bits in the Basic Device Identifier is sufficient. Alternatively, using a (pseudo) random number generator to dynamically generate part of the Basic Device Identifier is sufficient as well, provided that the generated part complies with the following requirements.

- The generated part shall comprise at least 20 bits.
- All possible values shall occur with equal probability.
- The Power Receiver shall not change the generated part while the Power Signal is applied.
- The Power Receiver shall retain the generated part for at least 2 seconds if the Power Signal is interrupted or removed.

Source: Qi Wireless Power Transfer System Specification.pdf

5.2.3.10 Extended Identification Packet (0x81)

Table 37 defines the format of the message contained in an Extended Identification Packet.

Table 37. Extended Identification

	b₇	b₆	b₅	b₄	b₃	b₂	b₁	b₀
B₀	<div style="display: flex; justify-content: space-between;"> (MSB) Extended Device Identifier (LSB) </div>							
⋮								
B₇								

Extended Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. See Section 5.2.3.8.

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

5.1.3.4.2.4 WPID Packets

The Power Receiver can optionally use a WPID Packet to identify itself to the Power Transmitter by sending a unique identification number.

The Power Receiver should interpret responses to WPID Packets as follows:

- If the Power Receiver receives an ACK Response, it should assume the Power Transmitter successfully received the Packet and verified the CRC data.
- If the Power Receiver receives an ND Response, it should assume that the Power Transmitter does not support WPID.
- If the Power Receiver receives a NAK Response, it should assume that a communication error occurred and it should resend the WPID Packet. The WPID value is transferred in two Packets; only the Packet(s) that received a NAK should be resent.

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

5.2.3.9 Wireless Power ID Packets (0x54 and 0x55)

Table 36 shows the format of the message payload contained in the Wireless Power Identification Packets.

Table 36. WP Identification Packets

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	(MSB) WPID (LSB)							
B ₁								
B ₂								
B ₃	(MSB) CRC (LSB)							
B ₄								

The fields of these data Packets have the following purpose:

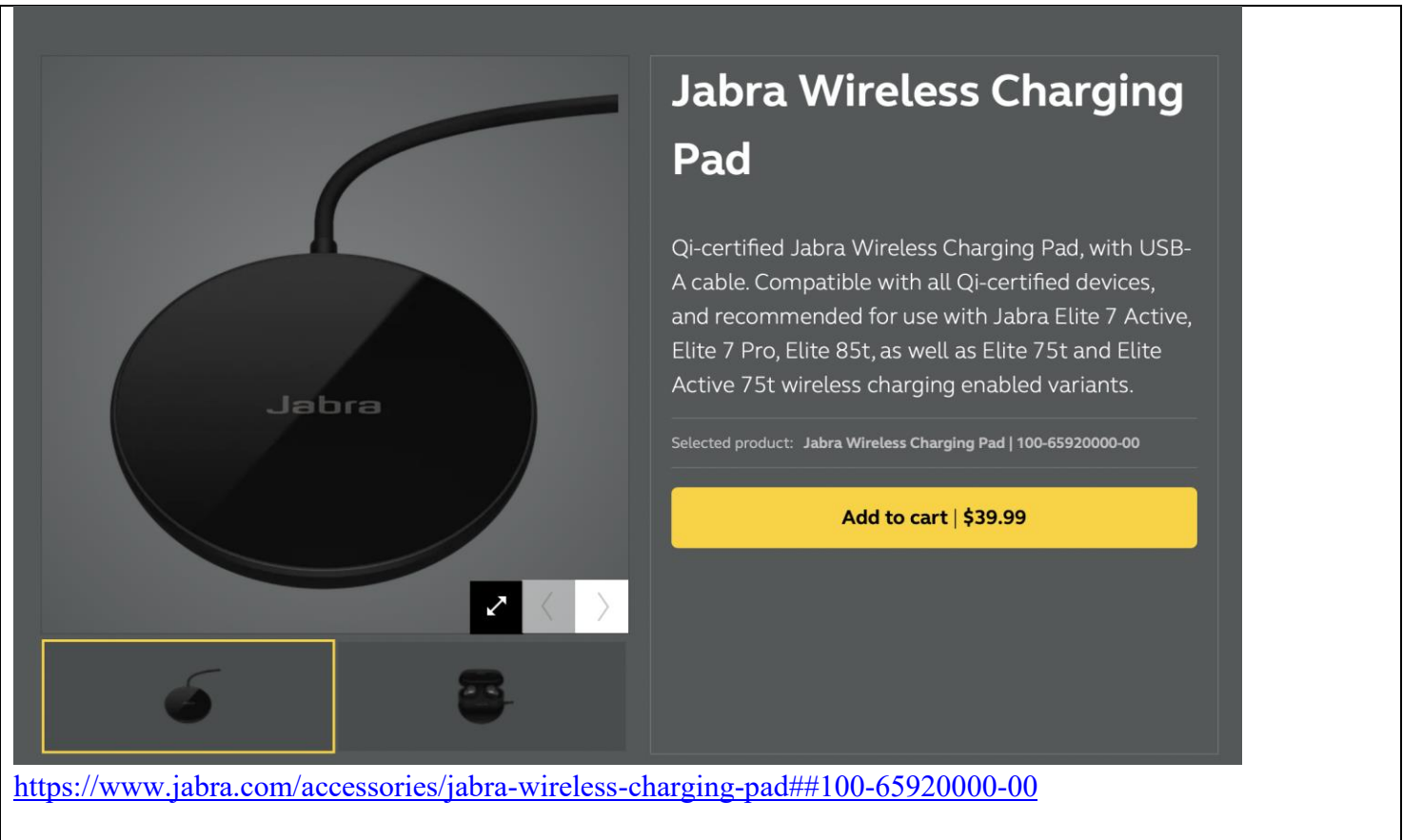
- **CRC**—unsigned integer. This field shall contain the Cyclic Redundancy Check (CRC) of the WPID field in this Packet. The CRC-16 value shall be calculated as defined in Section 5.2.3.9.1.
- **WPID**—bit string. This field shall contain the 24 most significant bits (Packet 0x54) or the 24 least significant bits (Packet 0x55) of the identifier that uniquely identifies the Power Receiver. For more information, see Section 5.1.3.4.2.4.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

	<table border="1" data-bbox="636 236 1944 587"> <tr> <td data-bbox="636 236 909 587">WPID Packet</td><td data-bbox="909 236 1944 587"> <p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p> </td></tr> </table> <p><i>Source: Qi Wireless Power Transfer System Specification.pdf</i></p>	WPID Packet	<p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p>
WPID Packet	<p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p>		
<p>wirelessly receiving, in response to transmitting the slave device identification to the master device, energy from the master device; and</p>	<p>The accused product practices wirelessly receiving, in response to transmitting the slave device identification (e.g., identification of the device to be charged) to the master device (e.g., the accused product), energy from the master device (e.g., the accused product).</p> <p>The accused product follows Qi-Standard. The device to be charged acts as a power receiver and the accused product acts as a power transmitter. The power receiver sends an identification to power transmitter for identification and verification. The power receiver receives an ACK response for successful verification and NAK response for unsuccessful verification. The power transmitter transfers power after successful verification.</p>		

EXHIBIT 2



Jabra Wireless Charging Pad

Qi-certified Jabra Wireless Charging Pad, with USB-A cable. Compatible with all Qi-certified devices, and recommended for use with Jabra Elite 7 Active, Elite 7 Pro, Elite 85t, as well as Elite 75t and Elite Active 75t wireless charging enabled variants.

Selected product: Jabra Wireless Charging Pad | 100-65920000-00

Add to cart | \$39.99

<https://www.jabra.com/accessories/jabra-wireless-charging-pad##100-65920000-00>

EXHIBIT 2

JABRA WIRELESS CHARGING PAD (5190003)**BRAND**

Jabra

PRODUCT NAME

Wireless Charging Pad

MANUFACTURER PART NUMBER

5190003

PRODUCT TYPE

Power Class 0 Transmitter

REGISTRATION DATE

January 13, 2022

**ADDITIONAL DETAILS**

Qi Registration id	12441
Version	1.2.4
Currently licensed	Yes
Power profile	Basic Power Profile
Transmitter design	A11a
Automotive Charger for inline assembly	No
Compliant Automotive Guidelines	No
Evaluation module	No
Potential power level	5 watts
Subsystem for integration in other products	No

<https://www.wirelesspowerconsortium.com/products/12441>

EXHIBIT 2

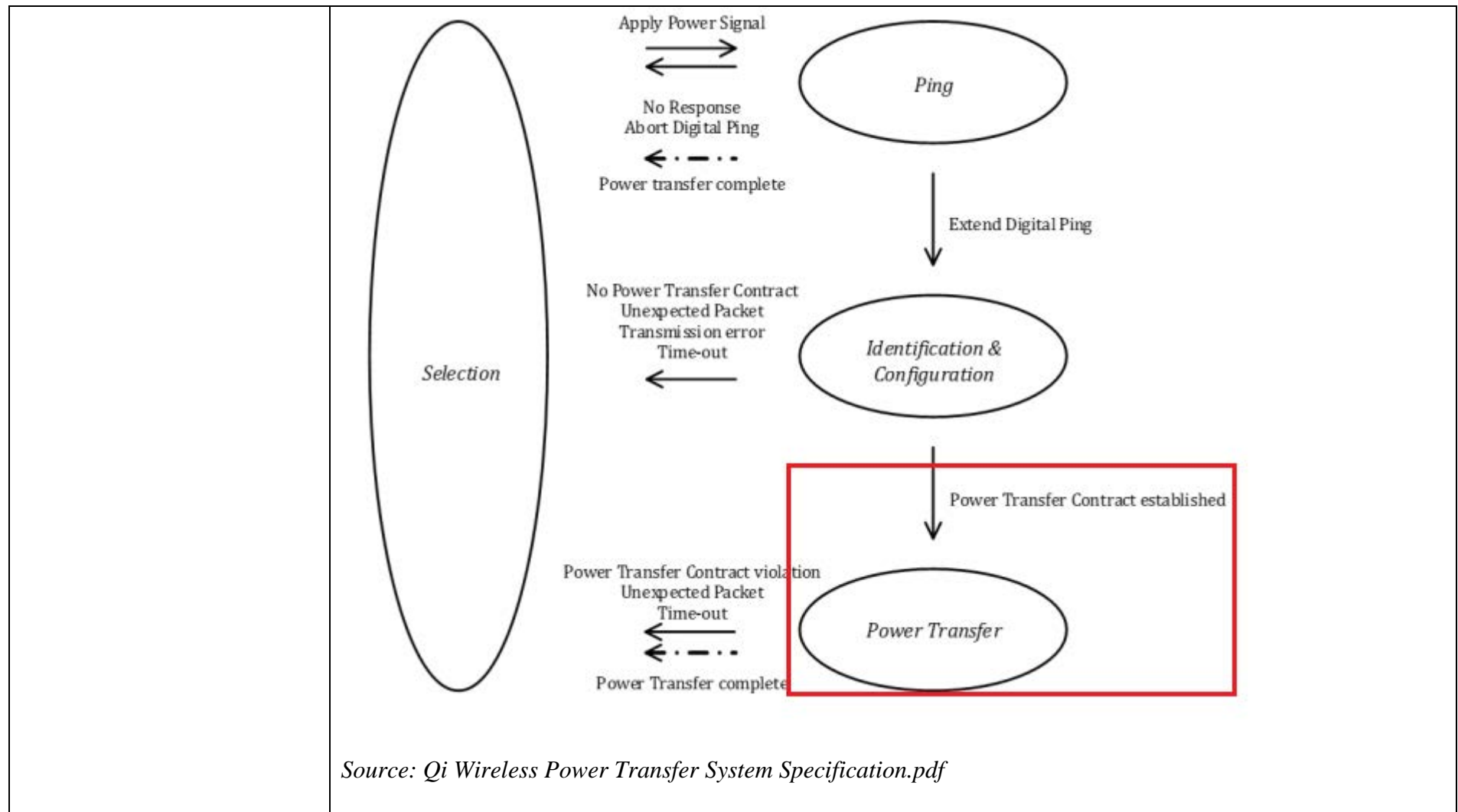


EXHIBIT 2

identification & configuration In this phase, the Power Transmitter identifies the selected Power Receiver, and obtains configuration information such as the maximum amount of power that the Power Receiver intends to provide at its output. The Power Transmitter uses this information to create a Power Transfer Contract. This Power Transfer Contract contains limits for several parameters that characterize the power transfer in the *power transfer* phase. At any time before proceeding to the *power transfer* phase, the Power Transmitter may decide to terminate the extended Digital Ping (for example, to discover additional Power Receivers). This reverts the system to the *selection* phase.

Source: *Qi Wireless Power Transfer System Specification.pdf*

5.1.3.3 Identification & configuration phase (PRx perspective)

In the identification & configuration phase, the Power Receiver shall transmit the following sequence of Packets:

- If the Power Receiver enters the *identification & configuration* phase from the *ping* phase, an Identification Packet.
- If the Ext bit of the preceding Identification Packet is set to ONE, an Extended Identification Packet.
- Up to 7 optional configuration Packets from the following set (the order in which the Power Receiver transmits these Packets, if any, is not relevant):
 - A Power Control Hold-off Packet. The Power Control Hold-off Time t_{delay} contained in this Packet shall satisfy the relation $t_{\text{delay}}^{(\min)} \leq t_{\text{delay}} \leq t_{\text{delay}}^{(\max)}$. See Table 10.
 - Any Proprietary Packet (as listed in Table 26).
 - A Configuration Packet.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

5.2.3.8 Identification Packet (0x71)

Table 35 defines the format of the message contained in an Identification Packet.

Table 35. Identification

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	Major Version				Minor Version			
B ₁	(MSB) <div>Manufacturer Code</div> (LSB)							
B ₂								
B ₃	Ext	(MSB) <div><u>Basic Device Identifier</u></div> (LSB)						
⋮								
B ₆								

Ext

- If this bit is set to ZERO, the bit string

Manufacturer Code || Basic Device Identifier

identifies the Power Receiver.

- If this bit is set to ONE, the bit string

Manufacturer Code || Basic Device Identifier || Extended Device Identifier

identifies the Power Receiver (see Section 0).

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

Basic Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. A Power Receiver manufacturer should ensure that the combination of Basic Device Identifier and Manufacturer ID is sufficiently unique. Embedding a serial number of at least 20 bits in the Basic Device Identifier is sufficient. Alternatively, using a (pseudo) random number generator to dynamically generate part of the Basic Device Identifier is sufficient as well, provided that the generated part complies with the following requirements.

- The generated part shall comprise at least 20 bits.
- All possible values shall occur with equal probability.
- The Power Receiver shall not change the generated part while the Power Signal is applied.
- The Power Receiver shall retain the generated part for at least 2 seconds if the Power Signal is interrupted or removed.

Source: Qi Wireless Power Transfer System Specification.pdf

5.2.3.10 Extended Identification Packet (0x81)

Table 37 defines the format of the message contained in an Extended Identification Packet.

Table 37. Extended Identification

	b₇	b₆	b₅	b₄	b₃	b₂	b₁	b₀
B₀	<div>(MSB)<div>Extended Device Identifier</div>(LSB)</div>							
⋮								
B₇								

Extended Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. See Section 5.2.3.8.

EXHIBIT 2

Source: Qi Wireless Power Transfer System Specification.pdf

5.1.3.4.2.4 WPID Packets

The Power Receiver can optionally use a WPID Packet to identify itself to the Power Transmitter by sending a unique identification number.

The Power Receiver should interpret responses to WPID Packets as follows:

- If the Power Receiver receives an ACK Response, it should assume the Power Transmitter successfully received the Packet and verified the CRC data.
- If the Power Receiver receives an ND Response, it should assume that the Power Transmitter does not support WPID.
- If the Power Receiver receives a NAK Response, it should assume that a communication error occurred and it should resend the WPID Packet. The WPID value is transferred in two Packets; only the Packet(s) that received a NAK should be resent.

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

5.2.3.9 Wireless Power ID Packets (0x54 and 0x55)

Table 36 shows the format of the message payload contained in the Wireless Power Identification Packets.

Table 36. WP Identification Packets

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	(MSB) WPID (LSB)							
B ₁								
B ₂								
B ₃	(MSB) CRC (LSB)							
B ₄								

The fields of these data Packets have the following purpose:

- **CRC**—unsigned integer. This field shall contain the Cyclic Redundancy Check (CRC) of the WPID field in this Packet. The CRC-16 value shall be calculated as defined in Section 5.2.3.9.1.
- **WPID**—bit string. This field shall contain the 24 most significant bits (Packet 0x54) or the 24 least significant bits (Packet 0x55) of the identifier that uniquely identifies the Power Receiver. For more information, see Section 5.1.3.4.2.4.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

	<table border="1" data-bbox="636 236 1944 590"> <tr> <td data-bbox="636 236 909 590">WPID Packet</td><td data-bbox="909 236 1944 590"> <p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p> </td></tr> </table> <p><i>Source: Qi Wireless Power Transfer System Specification.pdf</i></p>	WPID Packet	<p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p>
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generating power from the wireless energy received from the master device for use by a set of electronic circuitry of the slave device.	The accused product practices generating power from the wireless energy (e.g., wireless power transfer) received from the master device (e.g., the accused product) for use by a set of electronic circuitry of the slave device (e.g., the device to be charged).		

EXHIBIT 2



Jabra Wireless Charging Pad

Qi-certified Jabra Wireless Charging Pad, with USB-A cable. Compatible with all Qi-certified devices, and recommended for use with Jabra Elite 7 Active, Elite 7 Pro, Elite 85t, as well as Elite 75t and Elite Active 75t wireless charging enabled variants.

Selected product: Jabra Wireless Charging Pad | 100-65920000-00

Add to cart | \$39.99

<https://www.jabra.com/accessories/jabra-wireless-charging-pad##100-65920000-00>

EXHIBIT 2

JABRA WIRELESS CHARGING PAD (5190003)**BRAND**

Jabra

PRODUCT NAME

Wireless Charging Pad

MANUFACTURER PART NUMBER

5190003

PRODUCT TYPE

Power Class 0 Transmitter

REGISTRATION DATE

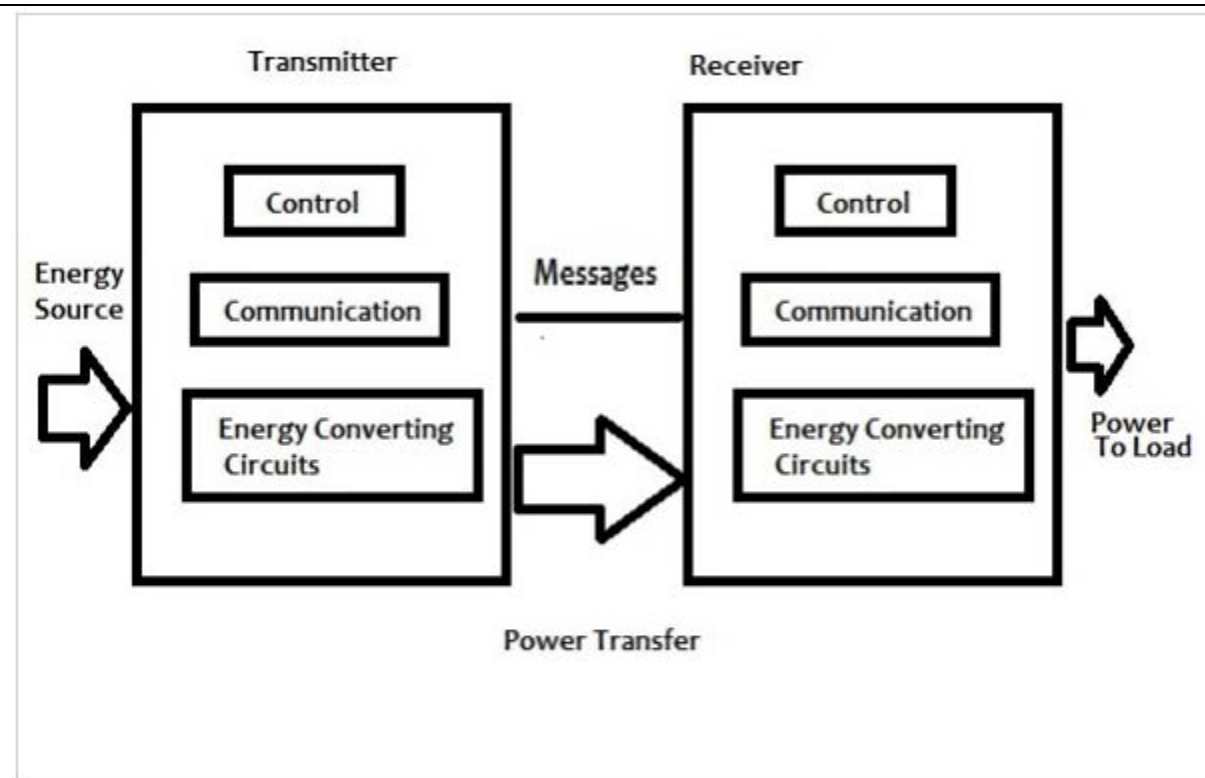
January 13, 2022

**ADDITIONAL DETAILS**

Qi Registration id	12441
Version	1.2.4
Currently licensed	Yes
Power profile	Basic Power Profile
Transmitter design	A11a
Automotive Charger for inline assembly	No
Compliant Automotive Guidelines	No
Evaluation module	No
Potential power level	5 watts
Subsystem for integration in other products	No

<https://www.wirelesspowerconsortium.com/products/12441>

EXHIBIT 2



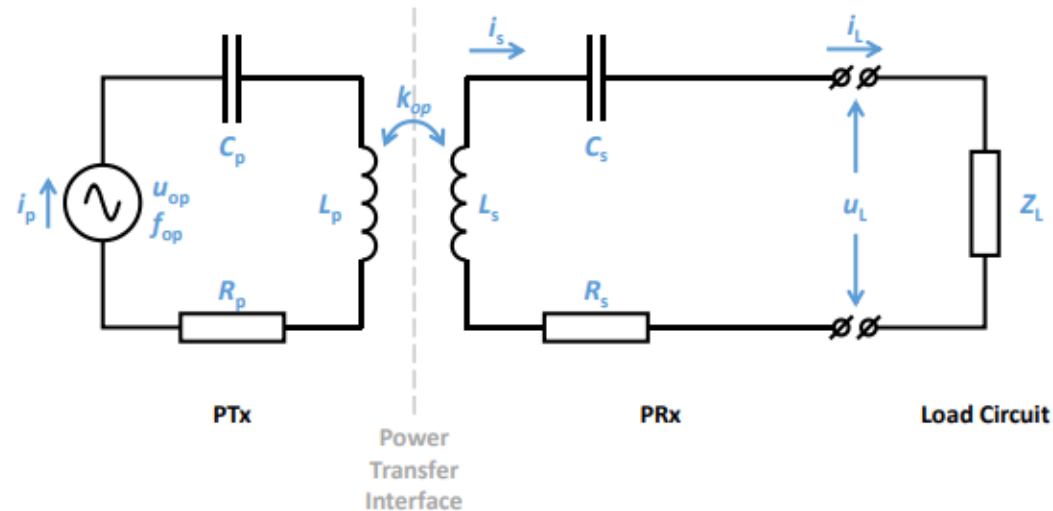
WPT transmitter/receiver block diagram.

<https://www.allaboutcircuits.com/technical-articles/introduction-to-wireless-power-transfer-wpt/>

EXHIBIT 2

Figure 10 illustrates a simplified model of the system comprising a Power Transmitter on the left and a Power Receiver on the right. For clarity, the load circuit is drawn separately from the Power Receiver. The Power Transmitter consists of a power source (u_{op}, f_{op}), a capacitance C_p , an inductance L_p , and a resistance R_p . The power source supplies a sinusoidal voltage u_{op} at a frequency f_{op} . The Power Receiver consists of a capacitance C_s , an inductance L_s , and a resistance R_s . A load having an impedance Z_L is connected to the output terminals of the Power Receiver. The symbols u_L , i_L , i_p , and k_{op} represent the load voltage, load current, Primary Coil current, and coupling factor.

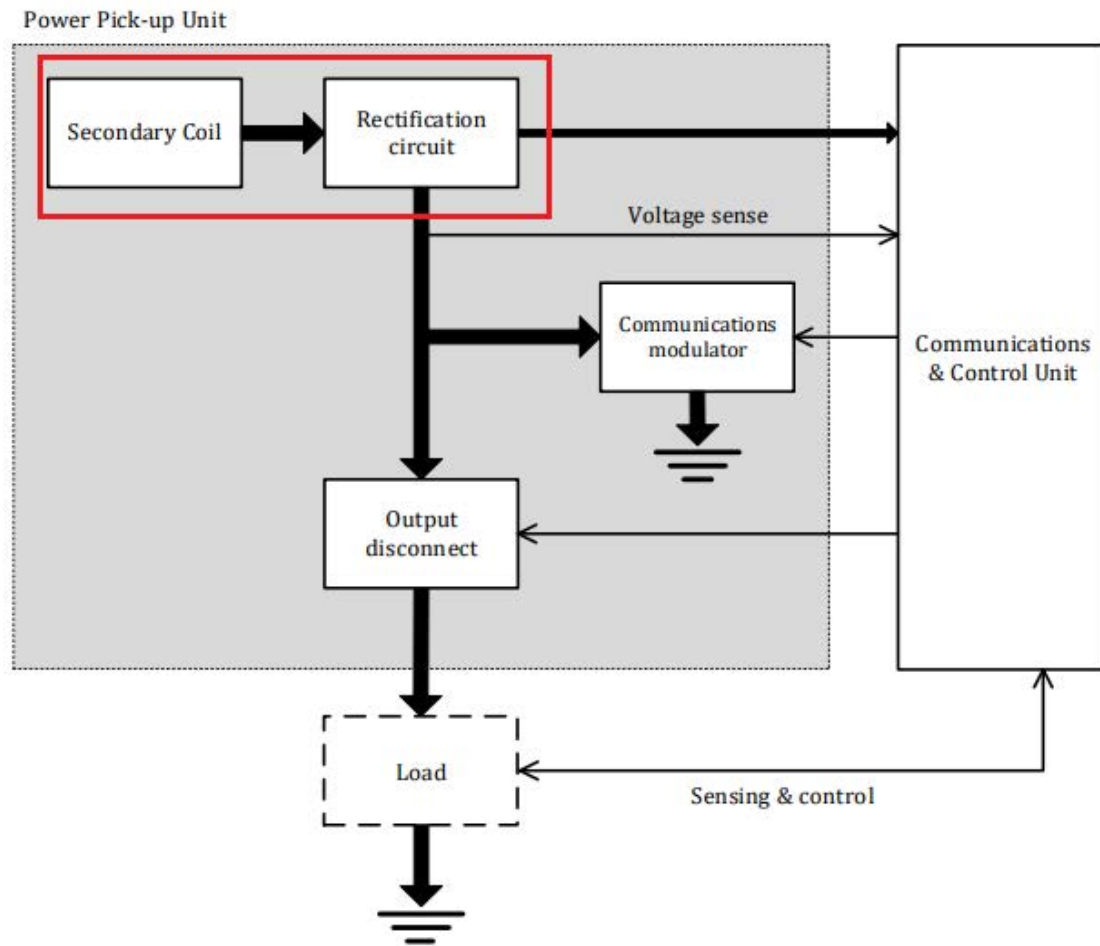
Figure 10. Simplified system model



Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

Figure 4. Functional block diagram for a Baseline Power Profile Power Receiver



Source: *Qi Wireless Power Transfer System Specification.pdf*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<p>CREEKVIEW IP LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>SKULLCANDY INC.,</p> <p>Defendant.</p>	<p>Case No.</p> <p>Patent Case</p> <p>Jury Trial Demanded</p>
--------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Creekview IP LLC (“Plaintiff”), through its attorneys, complains of Skullcandy Inc. (“Defendant”), and alleges the following:

PARTIES

1. Plaintiff Creekview IP LLC is a limited liability company with its principal place of business at 7548 Preston Rd, STE 141 PMB 1115, Frisco, TX 75034.
2. Upon information and belief, Defendant is a corporation organized under the laws of Delaware, having a principal place of business at 6301 N. Landmark Dr., Park City, Utah 84098. Upon information and belief, Defendant may be served with process c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

JURISDICTION

3. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.
4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

below (among the “Exemplary Defendant Products”) that infringe at least the exemplary claims of the ‘472 Patent also identified in the charts incorporated into this Count below (the “Exemplary ‘472 Patent Claims”) literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the ‘472 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

12. Defendants also have directly infringed, literally or under the doctrine of equivalents, the Exemplary '472 Patent Claims, by having its employees internally test and use these Exemplary Products.

13. Exhibit 2 includes charts comparing the Exemplary '472 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '472 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '472 Patent Claims.

14. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 2.

15. Plaintiff is entitled to recover damages adequate to compensate for Defendants' infringement.

JURY DEMAND

16. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the following relief:

- A. A judgment that the ‘472 Patent is valid and enforceable;
- B. A judgment that Defendants have infringed, one or more claims of the ‘472 Patent;
- C. An accounting of all damages not presented at trial;

- D. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendants' infringement with respect to the '472 patent;
- E. And, if necessary, to adequately compensate Plaintiff for Defendants' infringement, an accounting:
 - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys' fees against Defendants that it incurs in prosecuting this action;
 - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and
 - iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

Dated: March 31, 2022

Respectfully submitted,

CHONG LAW FIRM PA

/s/Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: chong@chonglawfirm.com

**Counsel for Plaintiff
Creekview IP LLC**

EXHIBIT 2

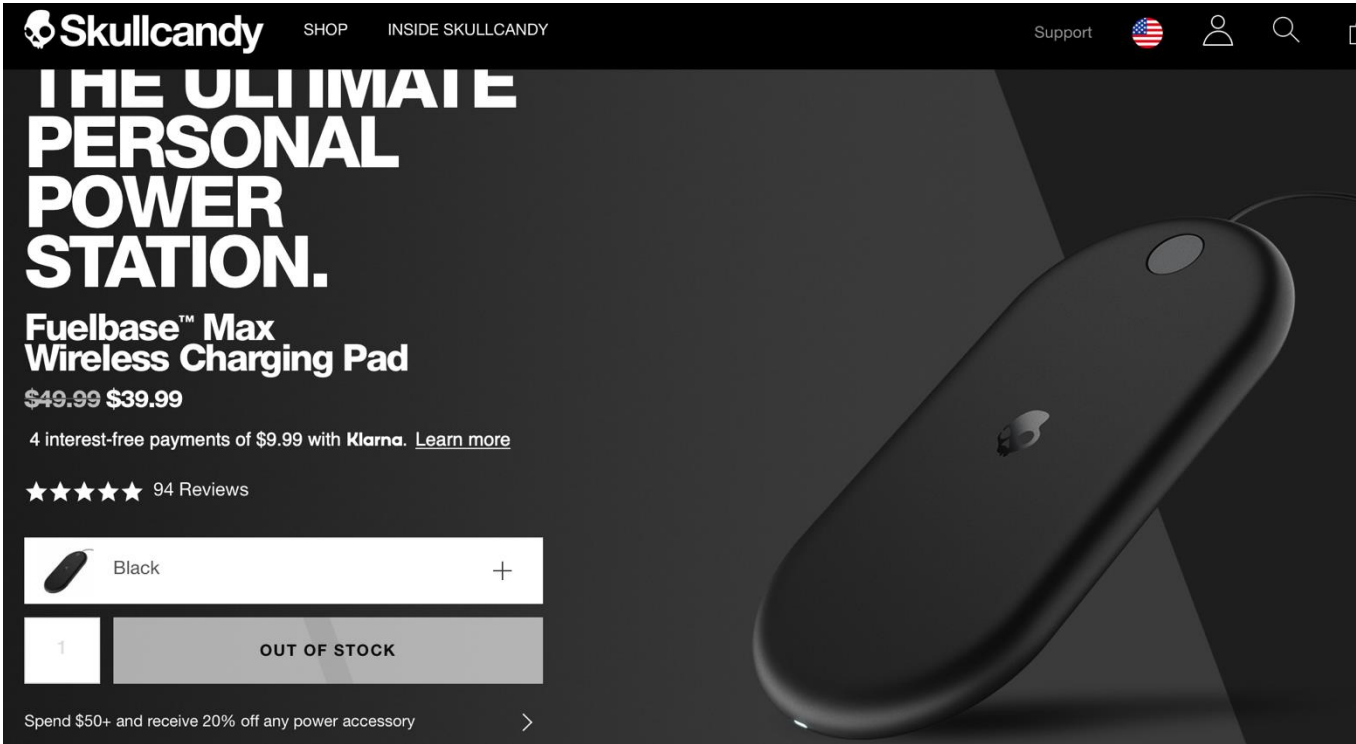
US9608472	Skullcandy Fuelbase Max Wireless Charging Pad (“The accused product”)
<p>19. A method for use by a slave device for generating power from energy wirelessly received from a master device, the method comprising:</p>	<p>The accused product practices a method for use by a slave device (e.g., device to be charged) for generating power from energy wirelessly received from a master device (e.g., the accused product).</p>  <p>https://www.skullcandy.com/shop/accessories/fuelbase-max</p>

EXHIBIT 2

	<div><div>Tech Specs</div><div>—</div><div>Product Type: Wireless Charger Inputs: Type-C 5V/2A , 9V/1.8A Outputs: 5W , 7.5W, 10W Total Output: 10 Watt Max Size: 156 x 68 x 11mm Operating Temp:0~35°C Weight: 163.5g</div><div>https://www.skullcandy.com/shop/accessories/fuelbase-max</div></div>	
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EXHIBIT 2

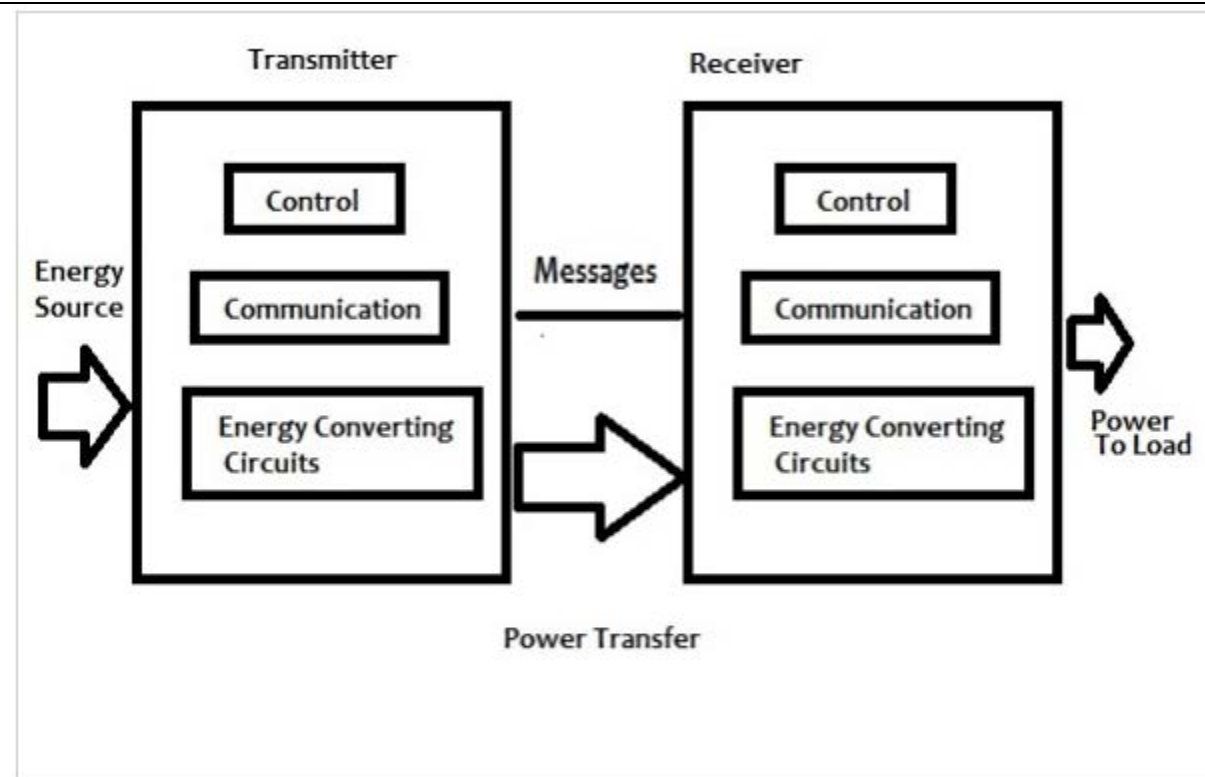
SET IT DOWN. CHARGE IT UP.

Wireless technology meets effortless convenience. Plug this pad into a power source and you'll never have to plug your devices into one. Just set them on the pad and let the magic of resonant inductive coupling do its thing.



<https://www.skullcandy.com/shop/accessories/fuelbase-max>

EXHIBIT 2



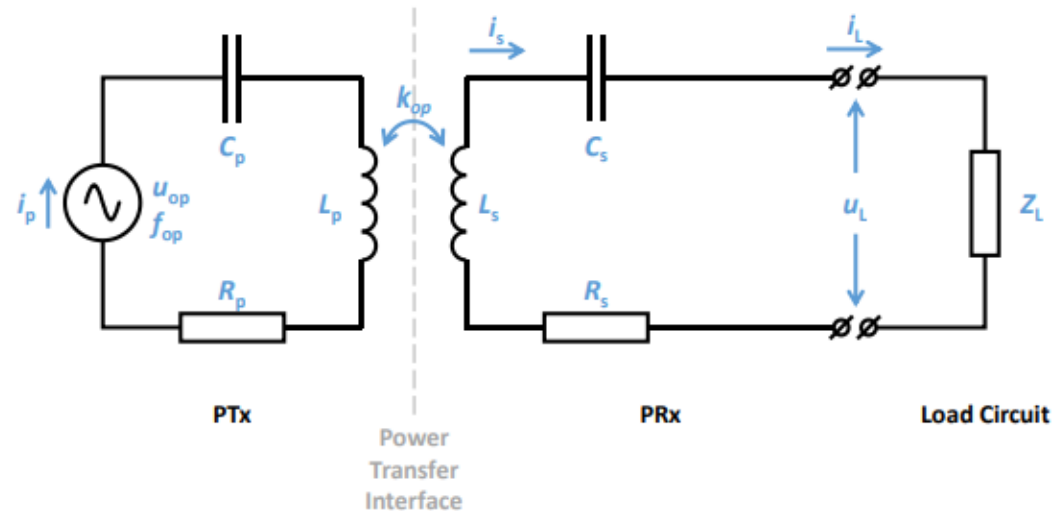
WPT transmitter/receiver block diagram.

<https://www.allaboutcircuits.com/technical-articles/introduction-to-wireless-power-transfer-wpt/>

EXHIBIT 2

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Figure 10. Simplified system model



Source: *Qi Wireless Power Transfer System Specification.pdf*

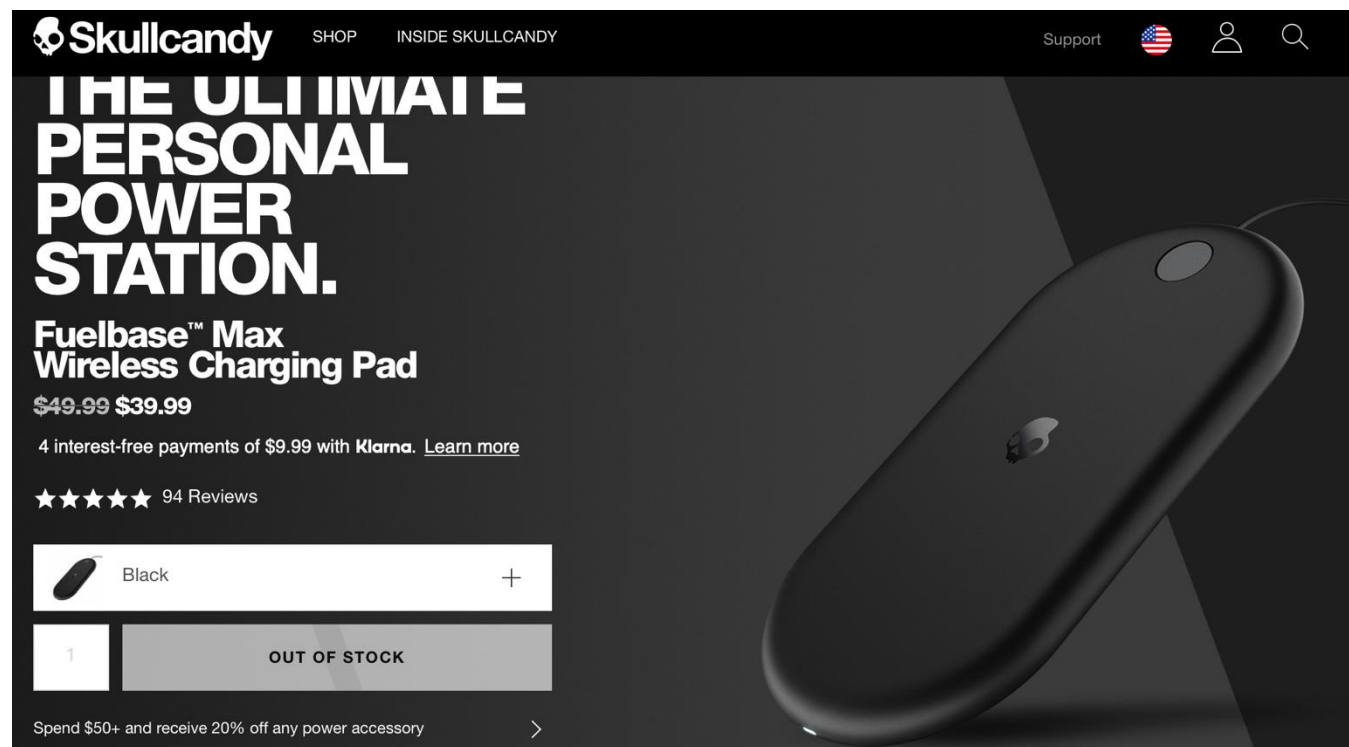
transmitting a slave device identification to the master device for determining authorization to wirelessly

The accused product practices transmitting a slave device identification (e.g., identification of the device to be charged) to the master device (e.g., the accused product) for determining authorization to wirelessly receive energy (e.g., wireless power transfer) from the master device (e.g., the accused product).

EXHIBIT 2

receive energy from the master device;

The accused product follows Qi-Standard. The device to be charged acts as a power receiver and the accused product acts as a power transmitter. The power receiver sends an identification to power transmitter for identification and verification. The power receiver receives an ACK response for successful verification and NAK response for unsuccessful verification.



<https://www.skullcandy.com/shop/accessories/fuelbase-max>

EXHIBIT 2

	<div><div>Tech Specs</div><div>—</div><div>Product Type: Wireless Charger Inputs: Type-C 5V/2A , 9V/1.8A Outputs: 5W , 7.5W, 10W Total Output: 10 Watt Max Size: 156 x 68 x 11mm Operating Temp:0~35°C Weight: 163.5g</div><div>https://www.skullcandy.com/shop/accessories/fuelbase-max</div></div>	
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EXHIBIT 2

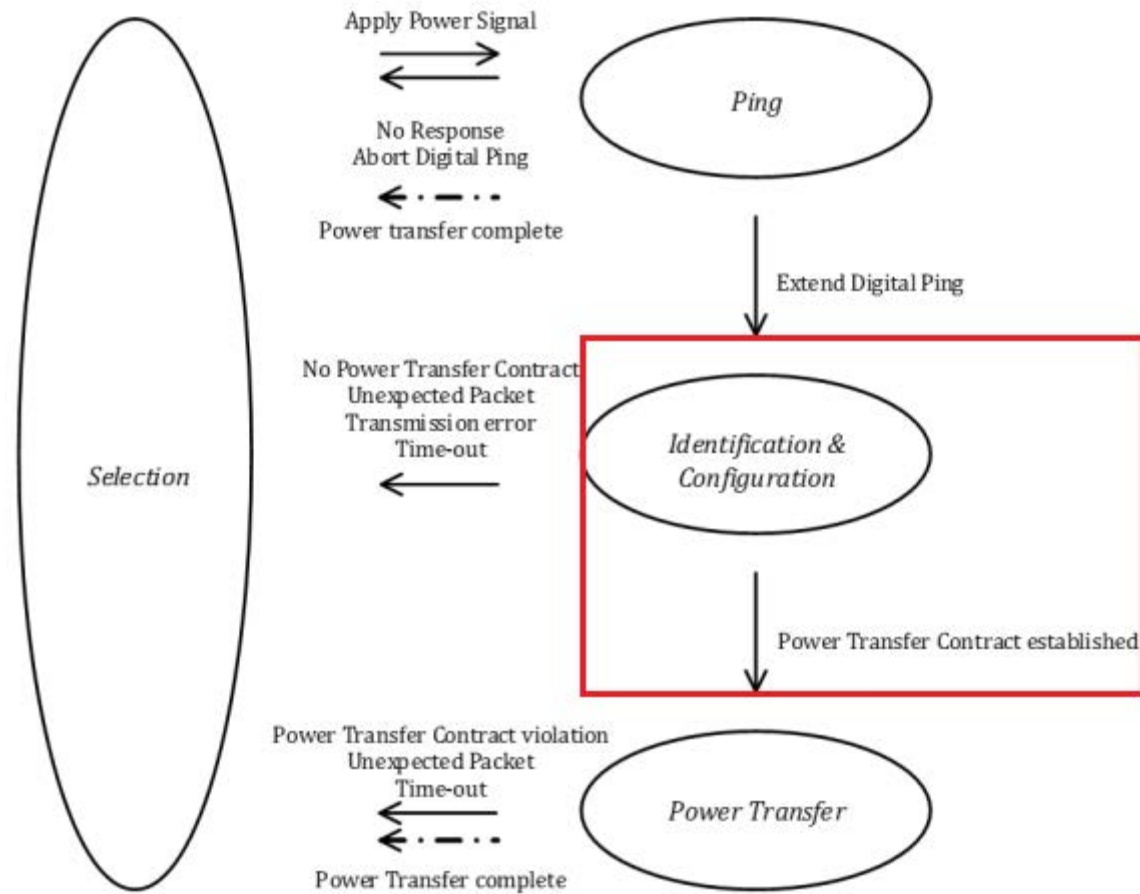
SET IT DOWN. CHARGE IT UP.

Wireless technology meets effortless convenience. Plug this pad into a power source and you'll never have to plug your devices into one. Just set them on the pad and let the magic of resonant inductive coupling do its thing.



<https://www.skullcandy.com/shop/accessories/fuelbase-max>

EXHIBIT 2

Figure 16. Power transfer phases—Baseline Power Profile

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

identification & configuration In this phase, the Power Transmitter identifies the selected Power Receiver, and obtains configuration information such as the maximum amount of power that the Power Receiver intends to provide at its output. The Power Transmitter uses this information to create a Power Transfer Contract. This Power Transfer Contract contains limits for several parameters that characterize the power transfer in the *power transfer* phase. At any time before proceeding to the *power transfer* phase, the Power Transmitter may decide to terminate the extended Digital Ping (for example, to discover additional Power Receivers). This reverts the system to the *selection* phase.

Source: *Qi Wireless Power Transfer System Specification.pdf*

5.1.3.3 Identification & configuration phase (PRx perspective)

In the identification & configuration phase, the Power Receiver shall transmit the following sequence of Packets:

- If the Power Receiver enters the *identification & configuration* phase from the *ping* phase, an Identification Packet.
- If the Ext bit of the preceding Identification Packet is set to ONE, an Extended Identification Packet.
- Up to 7 optional configuration Packets from the following set (the order in which the Power Receiver transmits these Packets, if any, is not relevant):
 - A Power Control Hold-off Packet. The Power Control Hold-off Time t_{delay} contained in this Packet shall satisfy the relation $t_{\text{delay}}^{(\min)} \leq t_{\text{delay}} \leq t_{\text{delay}}^{(\max)}$. See Table 10.
 - Any Proprietary Packet (as listed in Table 26).
 - A Configuration Packet.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

5.2.3.8 Identification Packet (0x71)

Table 35 defines the format of the message contained in an Identification Packet.

Table 35. Identification

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	Major Version				Minor Version			
B ₁	(MSB) <div>Manufacturer Code</div> (LSB)							
B ₂								
B ₃	Ext	(MSB) <div><u>Basic Device Identifier</u></div> (LSB)						
⋮								
B ₆								

Ext

- If this bit is set to ZERO, the bit string

Manufacturer Code || Basic Device Identifier

identifies the Power Receiver.

- If this bit is set to ONE, the bit string

Manufacturer Code || Basic Device Identifier || Extended Device Identifier

identifies the Power Receiver (see Section 0).

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

Basic Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. A Power Receiver manufacturer should ensure that the combination of Basic Device Identifier and Manufacturer ID is sufficiently unique. Embedding a serial number of at least 20 bits in the Basic Device Identifier is sufficient. Alternatively, using a (pseudo) random number generator to dynamically generate part of the Basic Device Identifier is sufficient as well, provided that the generated part complies with the following requirements.

- The generated part shall comprise at least 20 bits.
- All possible values shall occur with equal probability.
- The Power Receiver shall not change the generated part while the Power Signal is applied.
- The Power Receiver shall retain the generated part for at least 2 seconds if the Power Signal is interrupted or removed.

Source: Qi Wireless Power Transfer System Specification.pdf

5.2.3.10 Extended Identification Packet (0x81)

Table 37 defines the format of the message contained in an Extended Identification Packet.

Table 37. Extended Identification

	b₇	b₆	b₅	b₄	b₃	b₂	b₁	b₀
B₀	(MSB) Extended Device Identifier (LSB)							
⋮								
B₇								

Extended Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. See Section 5.2.3.8.

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

5.1.3.4.2.4 WPID Packets

The Power Receiver can optionally use a WPID Packet to identify itself to the Power Transmitter by sending a unique identification number.

The Power Receiver should interpret responses to WPID Packets as follows:

- If the Power Receiver receives an ACK Response, it should assume the Power Transmitter successfully received the Packet and verified the CRC data.
- If the Power Receiver receives an ND Response, it should assume that the Power Transmitter does not support WPID.
- If the Power Receiver receives a NAK Response, it should assume that a communication error occurred and it should resend the WPID Packet. The WPID value is transferred in two Packets; only the Packet(s) that received a NAK should be resent.

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

5.2.3.9 Wireless Power ID Packets (0x54 and 0x55)

Table 36 shows the format of the message payload contained in the Wireless Power Identification Packets.

Table 36. WP Identification Packets

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	(MSB) WPID (LSB)							
B ₁								
B ₂								
B ₃	(MSB) CRC (LSB)							
B ₄								


The fields of these data Packets have the following purpose:





- **CRC**—unsigned integer. This field shall contain the Cyclic Redundancy Check (CRC) of the WPID field in this Packet. The CRC-16 value shall be calculated as defined in Section 5.2.3.9.1.
- **WPID**—bit string. This field shall contain the 24 most significant bits (Packet 0x54) or the 24 least significant bits (Packet 0x55) of the identifier that uniquely identifies the Power Receiver. For more information, see Section 5.1.3.4.2.4.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

	<table border="1" data-bbox="636 236 1944 587"> <tr> <td data-bbox="636 236 909 587">WPID Packet</td><td data-bbox="909 236 1944 587"> <p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p> </td></tr> </table> <p><i>Source: Qi Wireless Power Transfer System Specification.pdf</i></p>	WPID Packet	<p>The Power Transmitter shall send</p> <ul style="list-style-type: none"> ▪ <u>An ACK response if the WPID Packet was correctly received and the verification was successful.</u> ▪ <u>A NAK response if the WPID Packet was correctly received but the verification failed.</u> ▪ An ND response if the Power Transmitter does not support WPID Packets. <p>If the Power Transmitter supports the optional WPID Packets, it shall verify the Packet contents using the CRC algorithm described in Section 5.2.3.9.1.</p>
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wirelessly receiving, in response to transmitting the slave device identification to the master device, energy from the master device; and	<p>The accused product practices wirelessly receiving, in response to transmitting the slave device identification (e.g., identification of the device to be charged) to the master device (e.g., the accused product), energy from the master device (e.g., the accused product).</p> <p>The accused product follows Qi-Standard. The device to be charged acts as a power receiver and the accused product acts as a power transmitter. The power receiver sends an identification to power transmitter for identification and verification. The power receiver receives an ACK response for successful verification and NAK response for unsuccessful verification. The power transmitter transfers power after successful verification.</p>		


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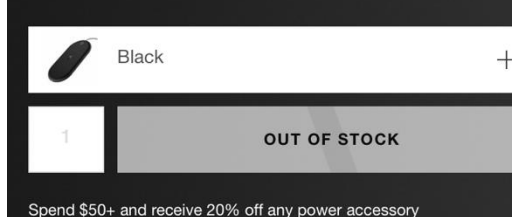


EXHIBIT 2

Tech Specs

Product Type: Wireless Charger

Inputs: Type-C 5V/2A , 9V/1.8A

Outputs: 5W , 7.5W, 10W

Total Output: 10 Watt Max

Size: 156 x 68 x 11mm

Operating Temp: 0~35°C

Weight: 163.5g

<https://www.skullcandy.com/shop/accessories/fuelbase-max>

EXHIBIT 2

SET IT DOWN. CHARGE IT UP.

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EXHIBIT 2

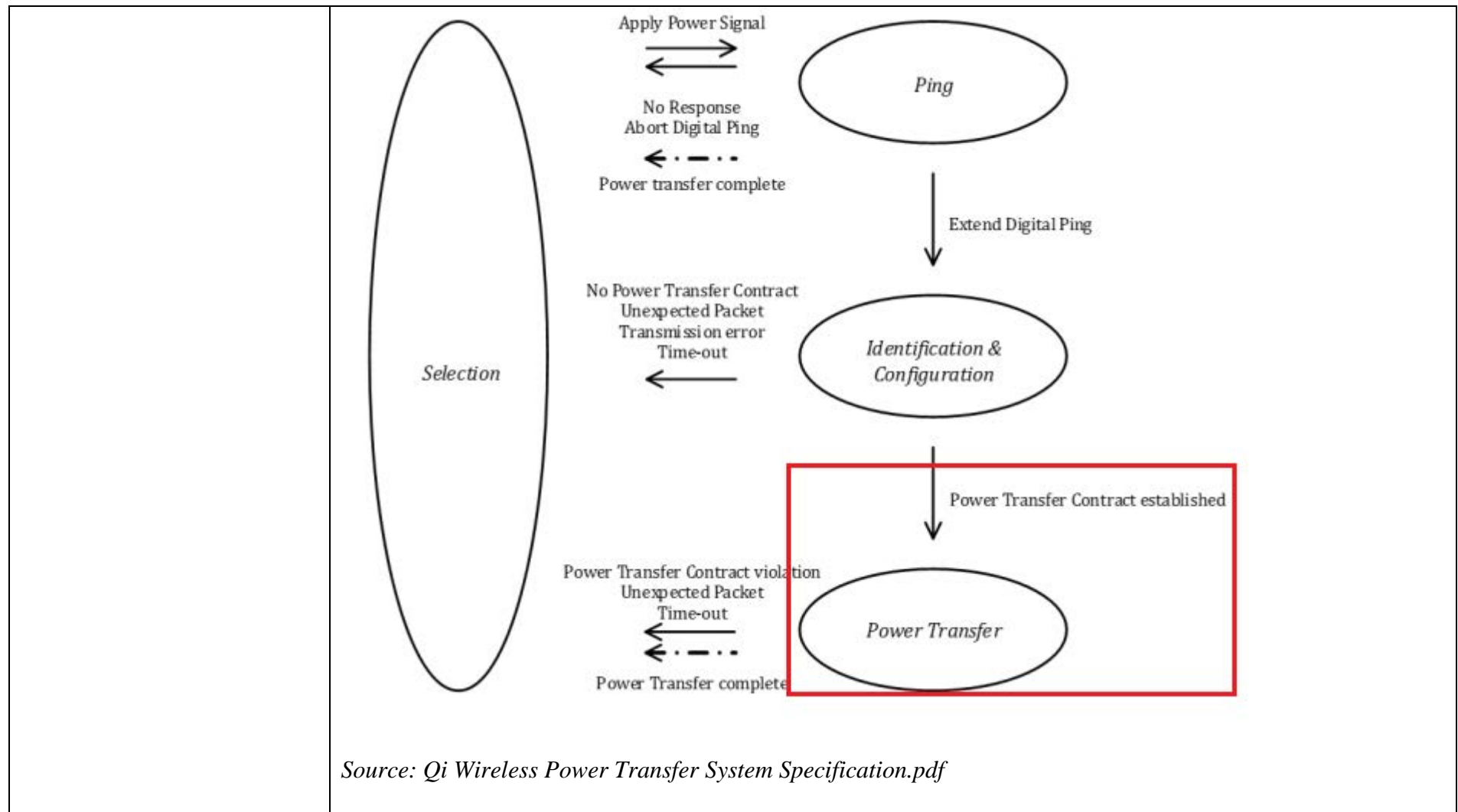


EXHIBIT 2

identification & configuration In this phase, the Power Transmitter identifies the selected Power Receiver, and obtains configuration information such as the maximum amount of power that the Power Receiver intends to provide at its output. The Power Transmitter uses this information to create a Power Transfer Contract. This Power Transfer Contract contains limits for several parameters that characterize the power transfer in the *power transfer* phase. At any time before proceeding to the *power transfer* phase, the Power Transmitter may decide to terminate the extended Digital Ping (for example, to discover additional Power Receivers). This reverts the system to the *selection* phase.

Source: *Qi Wireless Power Transfer System Specification.pdf*

5.1.3.3 Identification & configuration phase (PRx perspective)

In the identification & configuration phase, the Power Receiver shall transmit the following sequence of Packets:

- If the Power Receiver enters the *identification & configuration* phase from the *ping* phase, an Identification Packet.
- If the Ext bit of the preceding Identification Packet is set to ONE, an Extended Identification Packet.
- Up to 7 optional configuration Packets from the following set (the order in which the Power Receiver transmits these Packets, if any, is not relevant):
 - A Power Control Hold-off Packet. The Power Control Hold-off Time t_{delay} contained in this Packet shall satisfy the relation $t_{\text{delay}}^{(\min)} \leq t_{\text{delay}} \leq t_{\text{delay}}^{(\max)}$. See Table 10.
 - Any Proprietary Packet (as listed in Table 26).
 - A Configuration Packet.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

5.2.3.8 Identification Packet (0x71)

Table 35 defines the format of the message contained in an Identification Packet.

Table 35. Identification

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	Major Version				Minor Version			
B ₁	(MSB) <div>Manufacturer Code</div> (LSB)							
B ₂								
B ₃	Ext	(MSB) <div><u>Basic Device Identifier</u></div> (LSB)						
⋮								
B ₆								

Ext

- If this bit is set to ZERO, the bit string

Manufacturer Code || Basic Device Identifier

identifies the Power Receiver.

- If this bit is set to ONE, the bit string

Manufacturer Code || Basic Device Identifier || Extended Device Identifier

identifies the Power Receiver (see Section 0).

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

Basic Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. A Power Receiver manufacturer should ensure that the combination of Basic Device Identifier and Manufacturer ID is sufficiently unique. Embedding a serial number of at least 20 bits in the Basic Device Identifier is sufficient. Alternatively, using a (pseudo) random number generator to dynamically generate part of the Basic Device Identifier is sufficient as well, provided that the generated part complies with the following requirements.

- The generated part shall comprise at least 20 bits.
- All possible values shall occur with equal probability.
- The Power Receiver shall not change the generated part while the Power Signal is applied.
- The Power Receiver shall retain the generated part for at least 2 seconds if the Power Signal is interrupted or removed.

Source: Qi Wireless Power Transfer System Specification.pdf

5.2.3.10 Extended Identification Packet (0x81)

Table 37 defines the format of the message contained in an Extended Identification Packet.

Table 37. Extended Identification

	b₇	b₆	b₅	b₄	b₃	b₂	b₁	b₀
B₀	<div style="display: flex; justify-content: space-between;"> (MSB) Extended Device Identifier (LSB) </div>							
⋮								
B₇								

Extended Device Identifier. The bit string contained in this field contributes to the identification of the Power Receiver. See Section 5.2.3.8.

EXHIBIT 2

Source: Qi Wireless Power Transfer System Specification.pdf

5.1.3.4.2.4 WPID Packets

The Power Receiver can optionally use a WPID Packet to identify itself to the Power Transmitter by sending a unique identification number.

The Power Receiver should interpret responses to WPID Packets as follows:

- If the Power Receiver receives an ACK Response, it should assume the Power Transmitter successfully received the Packet and verified the CRC data.
- If the Power Receiver receives an ND Response, it should assume that the Power Transmitter does not support WPID.
- If the Power Receiver receives a NAK Response, it should assume that a communication error occurred and it should resend the WPID Packet. The WPID value is transferred in two Packets; only the Packet(s) that received a NAK should be resent.

Source: Qi Wireless Power Transfer System Specification.pdf

EXHIBIT 2

5.2.3.9 Wireless Power ID Packets (0x54 and 0x55)

Table 36 shows the format of the message payload contained in the Wireless Power Identification Packets.

Table 36. WP Identification Packets

	b ₇	b ₆	b ₅	b ₄	b ₃	b ₂	b ₁	b ₀
B ₀	(MSB) WPID (LSB)							
B ₁								
B ₂								
B ₃	(MSB) CRC (LSB)							
B ₄								

The fields of these data Packets have the following purpose:

- **CRC**—unsigned integer. This field shall contain the Cyclic Redundancy Check (CRC) of the WPID field in this Packet. The CRC-16 value shall be calculated as defined in Section 5.2.3.9.1.
- **WPID**—bit string. This field shall contain the 24 most significant bits (Packet 0x54) or the 24 least significant bits (Packet 0x55) of the identifier that uniquely identifies the Power Receiver. For more information, see Section 5.1.3.4.2.4.

Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

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generating power from the wireless energy received from the master device for use by a set of electronic circuitry of the slave device.	The accused product practices generating power from the wireless energy (e.g., wireless power transfer) received from the master device (e.g., the accused product) for use by a set of electronic circuitry of the slave device (e.g., the device to be charged).		

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	<div><h3>Tech Specs</h3><p>Product Type: Wireless Charger Inputs: Type-C 5V/2A , 9V/1.8A Outputs: 5W , 7.5W, 10W Total Output: 10 Watt Max Size: 156 x 68 x 11mm Operating Temp:0~35°C Weight: 163.5g</p><p>https://www.skullcandy.com/shop/accessories/fuelbase-max</p></div>	
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EXHIBIT 2

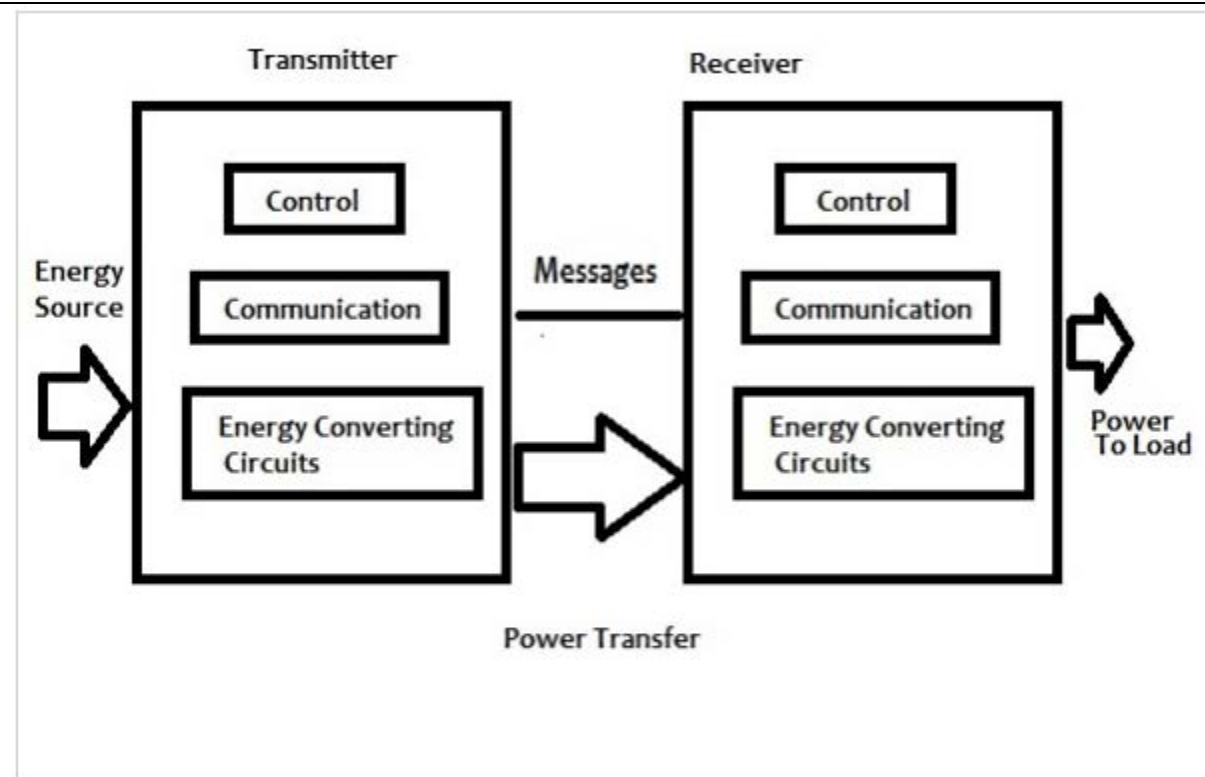
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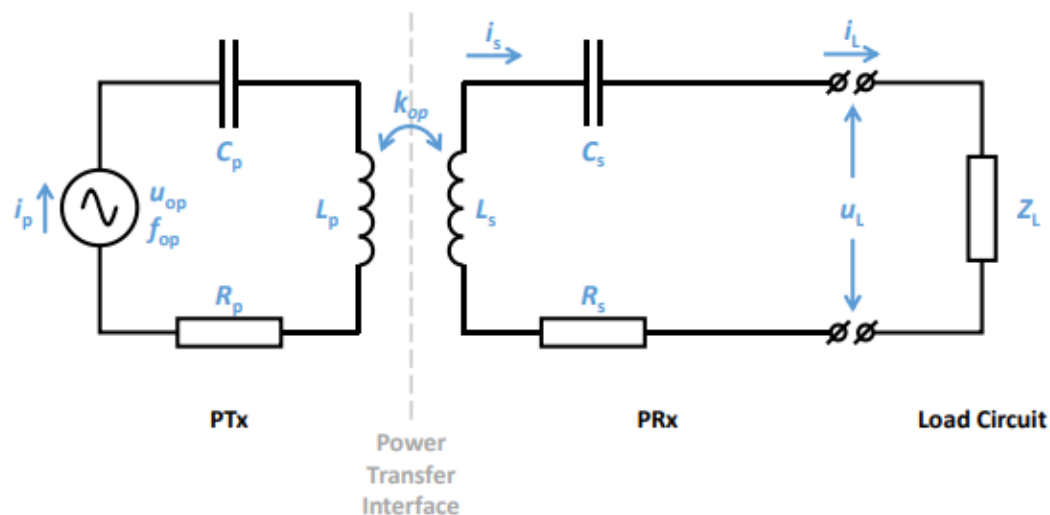
WPT transmitter/receiver block diagram.

<https://www.allaboutcircuits.com/technical-articles/introduction-to-wireless-power-transfer-wpt/>

EXHIBIT 2

Figure 10 illustrates a simplified model of the system comprising a Power Transmitter on the left and a Power Receiver on the right. For clarity, the load circuit is drawn separately from the Power Receiver. The Power Transmitter consists of a power source (u_{op}, f_{op}), a capacitance C_p , an inductance L_p , and a resistance R_p . The power source supplies a sinusoidal voltage u_{op} at a frequency f_{op} . The Power Receiver consists of a capacitance C_s , an inductance L_s , and a resistance R_s . A load having an impedance Z_L is connected to the output terminals of the Power Receiver. The symbols u_L , i_L , i_p , and k_{op} represent the load voltage, load current, Primary Coil current, and coupling factor.

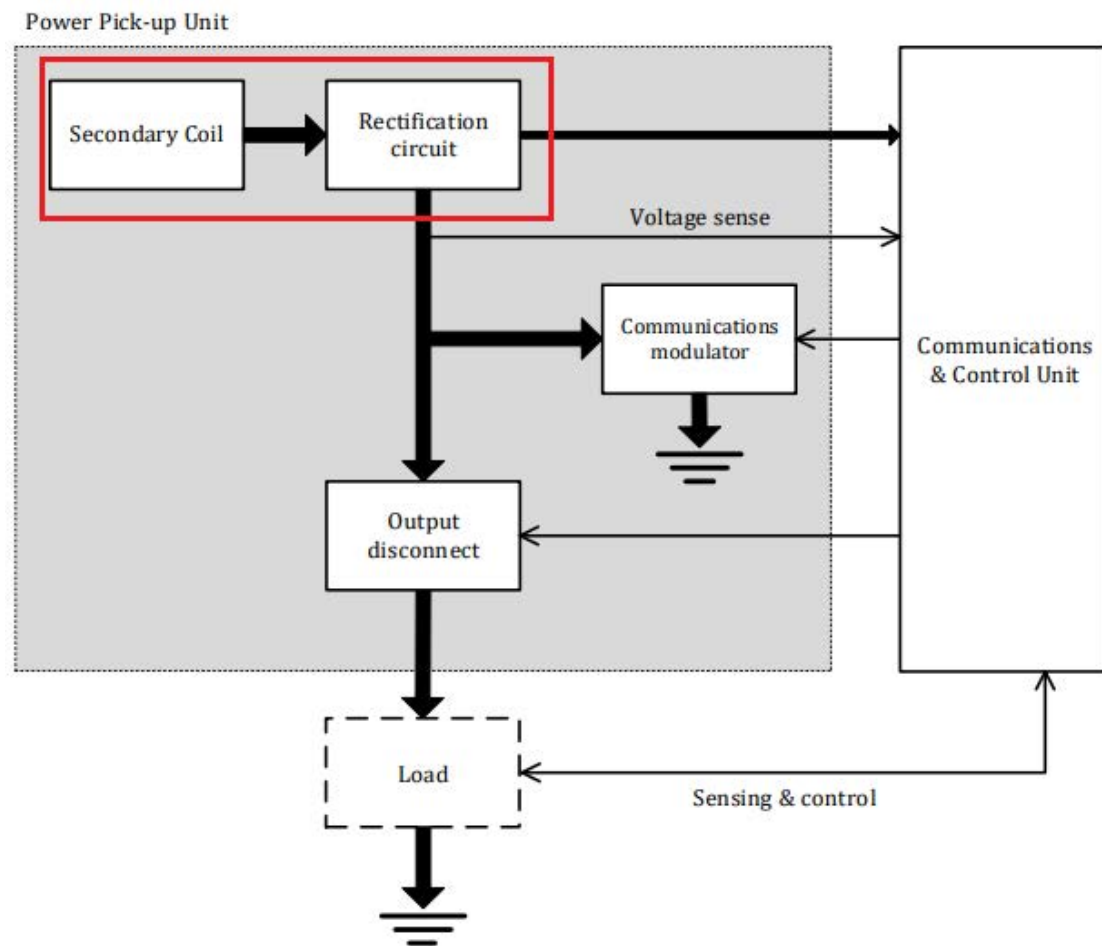
Figure 10. Simplified system model



Source: *Qi Wireless Power Transfer System Specification.pdf*

EXHIBIT 2

Figure 4. Functional block diagram for a Baseline Power Profile Power Receiver



Source: *Qi Wireless Power Transfer System Specification.pdf*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CREEKVIEW IP LLC,

Plaintiff,

v.

JABRA CORPORATION,

Defendant.

Civil Action No.: 1:22-cv-00426-CFC

TRIAL BY JURY DEMANDED

AMENDED CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and this Court's April 18, 2022 Standing Order Regarding Disclosure Statements, Plaintiff Creekview IP LLC hereby submits its Amended Corporate Disclosure Statement. Plaintiff states that it is a Texas limited liability company, its sole owner and managing partner is Jacob LaPray, it does not have a parent corporation, and no publicly held corporation owns ten percent (10%) or more of its stock.

Dated: September 2, 2022

Respectfully submitted,

CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: patent@chonglawfirm.com

ATTORNEYS FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CREEKVIEW IP LLC,

Plaintiff,

v.

SKULLCANDY INC.,

Defendant.

Civil Action No.: 1:22-cv-00427-CFC

TRIAL BY JURY DEMANDED

AMENDED CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and this Court's April 18, 2022 Standing Order Regarding Disclosure Statements, Plaintiff Creekview IP LLC hereby submits its Amended Corporate Disclosure Statement. Plaintiff states that it is a Texas limited liability company, its sole owner and managing partner is Jacob LaPray, it does not have a parent corporation, and no publicly held corporation owns ten percent (10%) or more of its stock.

Dated: September 2, 2022

Respectfully submitted,

CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: patent@chonglawfirm.com

ATTORNEYS FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CREEKVIEW IP LLC,

Plaintiff,

v.

JABRA CORPORATION,

Defendant.

Civil Action No.: 1:22-cv-00426-CFC

TRIAL BY JURY DEMANDED

NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE

Now comes Plaintiff, Creekview IP LLC, by and through its counsel, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), and hereby voluntarily dismisses all of the claims asserted against Defendant Jabra Corporation in the within action With Prejudice with each party bearing their own costs and fees. Jabra Corporation has not filed an answer or a motion for summary judgment.

Dated: October 6, 2022

Respectfully submitted,

CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: patent@chonglawfirm.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Jimmy Chong, certify that on October 6, 2022 this document was electronically filed with the Clerk of the Court using the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Jimmy Chong
Jimmy Chong (#4839)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CREEKVIEW IP LLC,

Plaintiff,

v.

JABRA CORPORATION,

Defendant.

Civil Action No.: 1:22-cv-00426-CFC

TRIAL BY JURY DEMANDED

CREEKVIEW IP LLC,

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v.

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Defendant.

Civil Action No.: 1:22-cv-00427-CFC

**PLAINTIFF’S STATEMENT REGARDING THIRD-PARTY LITIGATION
FUNDING ARRANGEMENTS**

Pursuant to this Court’s April 18, 2022 Standing Order Regarding Third-Party Litigation Funding Arrangements, Plaintiff Creekview IP LLC (“Plaintiff”) hereby states that it has made arrangements with Jimmy Chong, Plaintiff’s lead counsel in this litigation, to represent Plaintiff on a contingent basis.

Plaintiff further states that all other funding, including any advances of fees and/or expenses is provided on a recourse basis.

Dated: October 6, 2022

Respectfully submitted,
CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: patent@chonglawfirm.com

ATTORNEYS FOR PLAINTIFF

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CREEKVIEW IP LLC,

Plaintiff,

v.

SKULLCANDY INC.,

Defendant.

Civil Action No. 1:22-cv-00427-CFC

JOINT STIPULATION TO DISMISS

Now comes Plaintiff, Creekview IP LLC and Defendant, Skullcandy Inc., by and through their counsel, pursuant to Fed. R. Civ. P 41(a)(2), hereby jointly stipulate and agree as follows:

Plaintiff voluntarily dismisses all of the claims asserted against Defendant Skullcandy Inc. in the within action Without Prejudice with each party bearing their own costs and fees.

Defendant voluntarily dismisses all of its counterclaims asserted against Plaintiff Creekview IP LLC in the within action Without Prejudice with each party bearing their own costs and fees.

Dated: September 28, 2022

CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

Respectfully Submitted,

BARNES & THORNBURG LLP

/s/ Chad S.C. Stover

Chad S.C. Stover (No. 4919)

2961 Centerville Road, Suite 350
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ATTORNEY FOR PLAINTIFF

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Glenn R. Bronson (admitted pro hac
vice)
J. Jeffrey Gunn (admitted pro hac
vice)
James C. Watson (admitted pro hac
vice)
TRASK BRITT P.C.
230 South 500 East, Suite 300
Salt Lake City, Utah 84102
GRBronson@traskbritt.com
JGunn@traskbritt.com
JCWatson@traskbritt.com

Attorneys for Defendant
Skullcandy Inc

SO ORDERED this ____ day of September, 2022.

UNITED STATES DISTRICT JUDGE

evidentiary hearing so Plaintiff may be fully responsive and ensure that the requested information is available to the Court.

If there are any further questions or concerns, please contact the undersigned at the Court's convenience.

Respectfully submitted,

CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

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**IN THE UNITED STATES DISTRICT COURT
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CREEKVIEW IP LLC,

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SKULLCANDY INC.,

Defendant.

Civil Action No.: 1:22-cv-00427-CFC

DECLARATION OF JACOB LAPRAY


I, Jacob LaPray, declare as follows:

1. I am the managing member and sole owner of Creekview IP LLC. I have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. Plaintiff Creekview IP LLC's Amended Rule 7.1 Disclosure Statement submitted at D.I. 14 in C.A. No. 22-cv-426-CFC and D.I. 17 in C.A. No. 1:22-cv-00427-CFC complies with the Court's April 18, 2022, Standing Order Regarding Disclosure Statements Required by Federal Rule of Civil Procedure 7.1 and discloses the name of every owner, member, and partner of Creekview IP LLC, proceeding up the chain of ownership until the name of every individual and corporation with a direct or indirect interest in the party has been identified.

3. Creekview IP LLC does not have arrangements to receive from a person or entity that is not a party funding for some or all of the party's attorney fees and/or expenses to litigate this action on a non-recourse basis in exchange for (1) a financial interest that is contingent upon the results of the litigation or (2) a non-monetary result that is not in the nature of a personal loan, bank loan, or insurance. Apart from the statement provided, Creekview IP LLC therefore has no additional information responsive to the Court's April 18, 2022, Court's Standing Order Regarding Third-Party Litigation Funding Arrangements.

I declare under penalty of perjury that the foregoing is true and correct and that I have signed this declaration in Haslet, Texas on October 4, 2022.



Jacob LaPray
Managing Member, Creekview IP LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CREEKVIEW IP LLC,

Plaintiff,

v.

JABRA CORPORATION,

Defendant.

Civil Action No.: 1:22-cv-00426-CFC

TRIAL BY JURY DEMANDED

CREEKVIEW IP LLC,

Plaintiff,

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SKULLCANDY INC.,

Defendant.

Civil Action No.: 1:22-cv-00427-CFC

PLAINTIFF’S MOTION TO STAY

On November 15, 2022, Nimitz Technologies LLC (“Nimitz”) filed with the United States Court of Appeals for the Federal Circuit a *Petition for Writ of Mandamus* in connection with cases Civ. No. 21-1247-CFC, Civ. No. 21-1362-CFC, Civ. No. 21-1855-CFC and Civ. No. 22-413-CFC (the “Nimitz Petition”). *In re Nimitz Technologies LLC*, No. 23-103 (Fed. Cir.). On November 17, 2022, the Court of Appeals for the Federal Circuit ordered briefing of Nimitz’ Petition and stayed the Memorandum Order involved in the Nimitz Petition “pending further action of [the Federal Circuit].”

Plaintiff Creekview IP, LLC has met and conferred with Defendants and, because of the dismissals filed in each case, Defendant Jabra Corporation takes no position on this or any future filings/proceedings concerning the disclosure issue. Defendant Skullcandy, Inc provides its consent on the motion.

Plaintiff Creekview IP, LLC, by and through undersigned counsel, respectfully moves this Court to stay any and all Orders and/or further proceedings in the above-captioned cases, including staying the evidentiary hearing scheduled for December 6, 2022, until such time as the Federal Circuit terminates the stay in connection with the Nimitz Petition.

This Court has discretion to stay litigation pending before the Court. Three factors are considered when deciding a motion to stay: (a) whether granting the stay will simplify the issues for trial; (b) the status of the litigation, particularly whether discovery is complete and a trial date has been set; and (c) whether a stay would cause the non-movant to suffer undue prejudice from any delay, or allow the movant to gain a clear tactical advantage. *E.g., C.R. Bard, Inc. v. AngioDynamics, Inc.*, 2022 U.S. Dist. LEXIS 36636 at *8 (D. Del. 2022). *St. Clair Intellectual Prop. Consultants, Inc. v. Sony Corp.*, 2003 U.S. Dist. LEXIS 27397, *3 (D.Del. Jan. 30, 2003).

Plaintiff submits that the decision on the Nimitz Petition will clarify jurisdictional concerns and is likely to be dispositive in the above-captioned cases

as well. The captioned litigations already have been dismissed by a stipulation of dismissal or notice voluntary dismissal. *State Nat'l Ins. Co. v. County of Camden*, 824 F.3d 399, 407 (3rd Cir. 2016); *SmallBizPros, Inc. v. MacDonald*, 618 F.3d 458, 463 (3rd Cir. 2010); *First Nat'l Bank v. Marine City, Inc.*, 411 F.2d 674, 677 (3rd Cir. 1969). The requested stay would not cause Defendant to suffer any prejudice. Plaintiff further submits that a stay of the above-captioned cases will conserve party and judicial resources, including eliminating the need for multiple parallel petitions for mandamus.

With regard to stays pending appeals, the normal rule is that:

In considering whether to grant a stay pending appeal, courts consider the following four factors: (1) whether the appellant has made a strong showing of the likelihood of success on the merits; (2) will the appellant suffer irreparable injury absent a stay; (3) would a stay substantially harm other parties with an interest in the litigation; and (4) whether a stay is in the public interest.

In re Revel AC, Inc., 802 F.3d 558, 565 (3d Cir. 2015). *See California v. Davis (In re Venoco, LLC)*, 2020 U.S. Dist. LEXIS 8349 at *6-7 (D. Del. 2020) (applying rule).

The above factors are met in this case. The Federal Circuit has stayed the Court's similar actions in the Nimitz cases, which implies that the Federal Circuit questions whether such proceedings should be occurring before they rule on the Mandamus. Furthermore, unlike the Nimitz cases, these cases are already dismissed, and, thus, a stay of the Memorandum Order will not impact the proceedings of the

case. Given that the cases are dismissed, there can be neither prejudice nor substantial harm to any party in granting the stay pending the Petition. At the same time, Plaintiff can suffer irreparable injury absent a stay as Plaintiff may be ordered to disclose highly confidential materials that the law may not consider relevant to any issue in the case. Finally, a stay is in the public interest because a stay will avoid the uncertainty of piecemeal litigation where Plaintiff may be forced to proceed in an unprecedented context while the validity of the process is being considered by an appellate court.

Very importantly, the stay will avoid the need for Plaintiff to file its own petition for a writ of mandamus. Plaintiff will be required to file the petition because these cases present the additional factor that the cases have been dismissed pursuant to Fed. R. Civ. P. 41(a) and thus will raise the question of whether this Court has jurisdiction *vel non* to pursue its *sua sponte* inquiries. Thus, a stay of the above-captioned cases will conserve party and judicial resources, including eliminating the need for multiple parallel petitions for mandamus.

The duration of the requested stay should extend until the Federal Circuit has ruled on the Nimitz Petition.

Alternatively, Plaintiff respectfully requests a stay of the above-captioned cases on grounds that the Court does not have any Article III jurisdiction to order the hearings and to order Plaintiffs' principals to appear at a hearing after the cases

have been dismissed. *State Nat'l Ins. Co.*, 824 F.3d at 407; *SmallBizPros*, 618 F.3d at 463; *First Nat'l Bank*, 411 F.2d at 677. There is no case or controversy to support the Court's authority to proceed.

Plaintiff further states that the evidentiary hearings are improper because (1) the Court did independent factual research without giving notice to the parties, (2) the Court did not disclose the independent factual research to the parties, (3) the Court relied on information from its independent factual research when entering its order on the hearing, yet the Court did not give the parties the opportunity to object to whether the Court should properly take judicial notice of the information found during its factual research, and (4) the Court did not disclose in its hearing order the factual basis for the Court's concern that Plaintiff's disclosures were not accurate. *Woods v Showers*, 822 Fed. Appx. 122, 126 (3rd Cir 2020) (non-precedential); *Pickett v. Sheridan Health Care Ctr.*, 664 F.3d 632, 650-651 (7th Cir. 2011; *United States v. Brocato*, 4 F.4th 296, 303-304 (5th Cir. 2021).

Thus, Plaintiffs further request that such a stay of the above-captioned cases be continued until the Court (a) discloses the independent factual research that it performed (*e.g.*, Internet searches, articles, websites, publicly available documents, discussions with persons who are not staff or employees of the Court); (b) discloses the facts (whether obtained through its independent factual research or otherwise) it relied on for the Court's concern that Plaintiff's statement that Plaintiff did not

receive any non-recourse third-party funding was not accurate; and (c) Plaintiff has an opportunity to object to the Court taking judicial notice of such information as a basis for entering its hearing Order.

A proposed form of Order is attached.

Pursuant to D. Del. Local Rule 7.1.1, counsel for the parties conferred prior to the filing of this motion.

Dated: November 18, 2022

Respectfully submitted,

CHONG LAW FIRM PA

/s/ Jimmy Chong

Jimmy Chong (#4839)

2961 Centerville Road, Suite 350

Wilmington, DE 19808

Telephone: (302) 999-9480

Facsimile: (302) 800-1999

Email: patent@chonglawfirm.com

ATTORNEYS FOR PLAINTIFF

Electronic Version v1.1
Stylesheet Version v1.2

EPAS ID: PAT7046231

SUBMISSION TYPE:	NEW ASSIGNMENT
NATURE OF CONVEYANCE:	ASSIGNMENT
CONVEYING PARTY DATA	
Name	Execution Date
ARRAY IP LLC	11/28/2021
RECEIVING PARTY DATA	
Name:	CREEKVIEW IP LLC
Street Address:	7548 PRESTON RD
Internal Address:	SUITE 141 PMB 1115
City:	FRISCO
State/Country:	TEXAS
Postal Code:	75034
PROPERTY NUMBERS Total: 1	
Property Type	Number
Patent Number:	9608472
CORRESPONDENCE DATA	
Fax Number:	
<i>Correspondence will be sent to the e-mail address first; if that is unsuccessful, it will be sent using a fax number, if provided; if that is unsuccessful, it will be sent via US Mail.</i>	
Email:	jacobmlapray93@gmail.com
Correspondent Name:	CREEKVIEW IP LLC
Address Line 1:	7548 PRESTON RD
Address Line 2:	SUITE 141 PMB 1115
Address Line 4:	FRISCO, TEXAS 75034
NAME OF SUBMITTER:	JACOB LAPRAY
SIGNATURE:	/Jacob LaPray/
DATE SIGNED:	11/30/2021
Total Attachments: 2	
source=Exhibit A - Patent Assignment - Array to Creekview - Fully Executed#page1.tif	
source=Exhibit A - Patent Assignment - Array to Creekview - Fully Executed#page2.tif	

Exhibit A

PATENT ASSIGNMENT

For good and valuable consideration, the receipt of which is hereby acknowledged, Array IP LLC, a limited liability company organized under the State of Texas having its offices at 3333 Preston Rd, Suite 300 – 1038, Frisco, TX 75034 (“**Assignor**”), does hereby assign, transfer, and convey unto Creekview IP LLC, a Texas limited liability company, having an address at 7548 Preston Rd, Suite 141 PMB 1115, Frisco, TX 75034, (“**Assignee**”), or its designees, all right, title, and interest that exist today and may exist in the future in and to any and all of the following (collectively, the “**Patent Rights**”):

(a) the patent applications and patents listed in the table below (the “**Patents**” or “**Patent**”);

Patent / Publication No(s).	Application No(s).	Country	Filing Date	Title of Patent(s) and First Named Inventor
9,608,472	14/223,841	US	03/24/2014	Method and apparatus for wirelessly transferring power and communicating with one or more slave devices Mehran Moshfeghi

(b) all right, title and interest to the Patent.

(g) all of the rights, privileges including the benefits of any attorney client privilege or attorney work product privilege, title and interest in and to the Patent sold, transferred, assigned and set over to Assignee hereunder including all income, royalties, damages and payments now or hereafter due or payable with respect thereto; and

(h) the right to bring any claim, sue, counterclaim, and recover for the past, present and future infringement of the rights assigned hereunder.

ASSIGNOR: Array IP LLC

By: _____



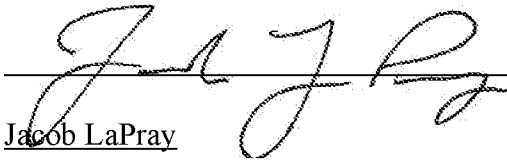
Name: _____ Tiffany Halfon

Title: _____ Managing Member

Date: _____ 23 November 2021

Exhibit A

ASSIGNEE: Creekview IP LLC

By: _____

Name: Jacob LaPray

Title: Managing Member

Date: 11/28/2021

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LAMPLIGHT LICENSING, LLC,)
)
Plaintiff,) C.A. No. 22-418-CFC
)
v.)
)
ABB, Inc.,)
)
Defendant.)
)
LAMPLIGHT LICENSING, LLC,)
)
Plaintiff,) C.A. No. 22-1017-CFC
)
v.)
)
INGRAM MICRO, Inc.,)
)
Defendant.)
)
NIMITZ TECHNOLOGIES LLC,)
)
Plaintiff,) C.A. No. 21-1247-CFC
)
v.)
)
CNET MEDIA, INC.,)
)
Defendant.)
)
NIMITZ TECHNOLOGIES LLC,)
)
Plaintiff,) C.A. No. 21-1362-CFC
)
v.)
)
BUZZFEED, INC.,)
)
Defendant.)

NIMITZ TECHNOLOGIES LLC,)
)
Plaintiff,) C.A. No. 21-1855-CFC
)
v.)
)
IMAGINE LEARNING LLC,)
)
Defendant.)
)
MELLACONIC IP, LLC,)
)
Plaintiff,) C.A. No. 22-244-CFC
)
v.)
)
TIMECLOCK PLUS, LLC,)
)
Defendant.)
)
MELLACONIC IP, LLC,)
)
Plaintiff,) C.A. No. 22-541-CFC
)
v.)
)
DEPUTY, INC.,)
)
Defendant.)

Friday, November 4, 2022
10:05 a.m.
Evidentiary Hearing

844 King Street
Wilmington, Delaware

BEFORE: THE HONORABLE COLM F. CONNOLLY
United States District Court Judge

APPEARANCES:

CHONG LAW FIRM PA
BY: JIMMY CHONG, ESQ.
Counsel for the Plaintiff Lamplight
Licensing, LLC and Mellaconic IP, LLC

O'KELLY & O'ROURKE, LLC
BY: GEORGE PAZUNIAK, ESQ.
BY: GERARD M. O'ROURKE, ESQ.
Counsel for the Plaintiff Nimitz
Technologies

SAND, SEBOLT & WERNOW CO., LPA
BY: HOWARD WERNOW, ESQ.
Counsel for the Plaintiff Mellaconic
IP, LLC

FISH & RICHARDSON, P.C.
BY: JEREMY ANDERSON, ESQ.
BY: LANCE WYATT, ESQ.
Counsel for the Defendant CNET,
Buzzfeed and Imagine Learning

- - - - -

P R O C E E D I N G S

(Proceedings commenced in the courtroom beginning at
10:05 a.m.)

THE COURT: All right. Please be seated.

All right. Good morning. We have a number of
cases at issue here today. Let's begin with Lamplight
Licensing.

Let's talk about that case, Mr. Chong.

MR. CHONG: Good morning, Your Honor.

THE COURT: Good morning.

Let me just get my papers together.

So the issue that prompted my order convening
this hearing in this case had to do with concerns about
whether there had been compliance with the third-party
litigation disclosure.

And I think it's -- you can have a seat,
Mr. Chong. It's going to take a little time to walk
through the record because, unfortunately, I think we have
to, because I set this hearing date at the request of you
on behalf of Sally Pugal.

Is she here today?

MR. CHONG: She is not, Your Honor.

THE COURT: Okay. Now, she's the owner, the

document.

MR. WERNOW: Sure.

BY MR. WERNOW:

Q. What do you remember about this patent purchase agreement, Mr. Bui?

A. There was 50 percent take back towards the previous.

Q. For consideration?

A. For consideration of the net proceeds.

Q. Okay. Can you please go to Exhibit 3.

What's your recollection of Exhibit 3 with respect to the recourse base repayment?

A. With Mavexar?

Q. Correct.

A. So Mavexar basically pays for the litigations of the -- fees for litigations. And then if all goes wrong, they have the right to come after me for the litigation fees.

Q. Okay. And the lawyers, what's your recollection of the attorneys' fees in this case?

A. That it's contingent basis, just depending on how far it goes along.

Q. The attorneys' fees are contingent, correct?

A. Yes.

Q. But the attorneys' expenses, were they part of this agreement with Mavexar?

A. Mavexar is going to pay the fees as a loan on a recourse basis.

Q. You said "fees," but do you mean "expenses"?

A. Expenses.

THE COURT: I mean, I don't know. What's the difference between fees and expenses, sir? Do you know?

THE WITNESS: I feel like -- I mean, I run a restaurant. I feel like fees and expenses are kind of the same, just to me, category, kind of. Something toward like a business or...

BY MR. WERNOW:

Q. And what's your recollection of the complaints that our office, or Mr. Curfman, has sent to you through Mavexar, you review those --

THE COURT: Object to leading. Ask him what he does.

BY MR. WERNOW:

Q. What do you do from Mavexar when someone sends you a complaint?

A. What was that?

Q. What do you do for Mellaconic IP, LLC, when you receive a complaint?

A. I review it and I either confirm it or deny it.

Q. And you can deny it, correct?

A. I can deny it.

MR. WERNOW: Thank you. Nothing further, Your Honor.

THE COURT: All right. Thank you very much.

And, Mr. Bui, you are excused, if you want.

All right. Mr. Anderson, you have been sitting here. Do you have any thoughts?

MR. ANDERSON: No, Your Honor. We have nothing to add to this. Thank you.

THE COURT: Anybody else want to say anything?

MR. WERNOW: Nothing further, Your Honor.

THE COURT: Well, I need to think about what I think are the issues that have been raised by the testimony we've heard today.

I think the testimony has to give pause to anybody who really is concerned about the integrity of our judicial system, the abuse of our courts, and potential abuse, lack of transparency as to who the real parties before the Court are, about who is making decisions in these types of litigation.

But it's a lot to digest, and I may ask for supplemental briefing. I'm actually considering inviting amici to come in to help. And I would be open to receiving recommendations for amici.

Anything else?

All right. If you have any recommendations for

amici, please submit them no later than a week from today. And the cases are going to remain where they are, as I consider these issues.

All right. We are adjourned.

(The proceedings concluded at 1:07 p.m.)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BACKERTOP LICENSING LLC,)
Plaintiff,) C.A. No. 1:22-cv-00573-CFC
v.)
AUGUST HOME, INC.,)
Defendant.)
BACKERTOP LICENSING LLC,)
Plaintiff,) C.A. No. 1:22-cv-0572-CFC
v.)
CANARY CONNECT, INC.,)
Defendant.)

Thursday, November 10, 2022
10:00 a.m.
Evidentiary Hearing

844 King Street
Wilmington, Delaware

BEFORE: THE HONORABLE COLM F. CONNOLLY
United States District Court Judge

1 APPEARANCES:

2
3 CHONG LAW FIRM PA
4 BY: JIMMY CHONG, ESQ.

5 -and-

6 FRESH IP, PLC
7 BY: RONALD BURNS, ESQ.

8 Counsel for the Plaintiff

9 CONNOLLY GALLAGHER
10 BY: ALAN R. SILVERSTEIN, ESQ.
11 Counsel for the Defendant

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1 Q. All right.

2 Can you tell me all of the sources of funding that
3 Backertop has for anything?

4 A. My understanding is, it's through Mavexar, is the
5 funding.

6 THE COURT: All right. Thank you very much.
7 You may step down. Appreciate it.

8 THE WITNESS: Thank you, Your Honor.

9 THE COURT: Thank you.

10 THE WITNESS: Did you want me to take these or
11 do you want a copy?

12 THE COURT: We'll take them.

13 THE WITNESS: Okay. Thank you, Your Honor.

14 THE COURT: Thank you.

15 Mr. Burns, do you wish to say anything?

16 MR. BURNS: I'm sorry, Your Honor?

17 THE COURT: Do you wish to say anything?

18 MR. BURNS: I don't have anything at this time,
19 Your Honor, not unless the Court has questions.

20 THE COURT: Who's the real owner? Who's the
21 real party in interest of the asserted patents in this
22 case?

23 MR. BURNS: Backertop.

24 THE COURT: And we've just heard testimony that
25 95 percent of the proceeds go to Mavexar.

1 **MR. BURNS:** I'm not clear on that part, because
2 I'm not clear on the agreement between Backertop and
3 Mavexar themselves. I know that, in acquiring the
4 patents, Backertop took on the obligation of Terrace to
5 the previous owner, the Daedalus Blue, I think, is who you
6 referred to, which was the 45 percent. And so --

7 **THE COURT:** 49 percent, I think.

8 **MR. BURNS:** I'm sorry, 49 percent. Excuse me.
9 And then Backertop, obviously, gets its 5 percent. And
10 then Mavexar has its portion. We, of course, have our
11 portion.

12 **THE COURT:** So what are the portions? What
13 does Mavexar get, under your understanding?

14 **MR. BURNS:** I'm -- I'm not sure. I'm not sure
15 of the arrangement between Backertop and Mr. Chong. I'm
16 only sure of what the arrangement is between my firm and
17 Backertop.

18 **THE COURT:** What does your firm get?

19 **MR. BURNS:** Depending on the stage of the
20 litigation. So in these two cases, we got nothing.
21 They're dismissed. We filed a motion to dismiss them, or
22 notice of dismissal. In a case where there's recovery, we
23 get 22.5 percent.

24 **THE COURT:** And what bar are you a member of?

25 **MR. BURNS:** Text State Bar, Your Honor.

1 **THE COURT:** How do you -- can you speak to the
2 professional rules of conduct and the circumstance where a
3 client is retained by a lawyer, but has no communication
4 whatsoever with the lawyer? How does that work?

5 How is the lawyer -- for instance, how can the
6 lawyer run conflicts and be assured that it doesn't have a
7 conflict?

8 How can the lawyer apprise the client of the
9 lawyer's obligations and the fiduciary responsibilities he
10 owes to the client?

11 I mean, all those questions. Have you looked
12 into that?

13 **MR. BURNS:** I'm familiar with what you're
14 referring to, yes, Your Honor.

15 **THE COURT:** So tell me, what rules are
16 implicated, and how is a lawyer able to do that under the
17 Rules of Professional Conduct?

18 **MR. BURNS:** Well, in this particular case, I
19 was approached by Mavexar. I have previously worked with
20 Papuol Chaudhari over a decade ago, when he was in
21 another -- he was in a law firm. We had done some patent
22 litigation previously together.

23 He reached out to me, indicated that he
24 represented and was essentially a consultant/agent for
25 some companies, would I like to examine and review some of

1 these portfolios and see if I can participate. I said
2 yes.

3 He sent me the agreement they had with
4 Backertop. I reviewed that. It seemed like agent status
5 or consultant status with Mavexar. I got the information
6 on Backertop and also got the information on the prospects
7 that they were looking at, and ran conflicts, checked that
8 way. And came back with --

9 **THE COURT:** What did you say about the
10 conflicts? What, you got --

11 **MR. BURNS:** I said I ran conflicts both with
12 Backertop and Ms. LaPray, and then also prospective
13 defendants in each of these cases, to make sure that, you
14 know, our firm had no conflicts. And then agreed to
15 representation.

16 Sent over a draft agreement. My understanding
17 is it was reviewed, agreed to. We signed it. And then I
18 began preparing the complaints.

19 **THE COURT:** Do you have a copy of your
20 retention agreement with Backertop?

21 **MR. BURNS:** I do not, Your Honor, no.

22 **THE COURT:** I would like a copy of it.

23 **MR. BURNS:** I would happily provide that to the
24 Court.

25 **THE COURT:** And, actually, we'll be issuing,

1 shortly, an order requesting production of a number of
2 documents. We're about to do it in some of the other
3 cases where these issues have arisen.

4 **MR. BURNS:** Yes, Your Honor.

5 **THE COURT:** You agree that the Court has an
6 obligation for the real parties in interest to be before
7 it to assure that?

8 **MR. BURNS:** I do agree, yes, sir.

9 **THE COURT:** I mean, there's a rule of Federal
10 Civil Procedure that addresses that, right?

11 **MR. BURNS:** That is correct, Your Honor.

12 **THE COURT:** Yeah. And are you -- you're of the
13 mind that Mavexar is not a real party in interest here; is
14 that your position?

15 **MR. BURNS:** That's -- yes, Your Honor, that
16 would be my position. My understanding is that -- and
17 according to documentation I reviewed, Backertop owns the
18 patents. The compensation is a contingent compensation to
19 the previous owner.

20 Mavexar, as a consultant and advisor to
21 Backertop, gets a portion. It runs a lot of the
22 administrative processes for Backertop, and then we run
23 the cases. And that's my understanding.

24 **THE COURT:** And by structuring this litigation
25 the way you have with Mavexar, you've basically put a

1 plaintiff in this court asserting a patent, and the
2 plaintiff has no assets. So you've immunized,
3 effectively, the plaintiff from the consequences of a
4 frivolous lawsuit, for instance.

5 Mavexar, who's driving the train, isn't
6 formally a party here, so you've insulated it, assuming
7 nobody wanted to look into this.

8 Fair?

9 **MR. BURNS:** I wouldn't completely agree with
10 that, Your Honor. The client here, Backertop has formed
11 as an LLC, which does provide a level of insulation for
12 Ms. LaPray personally.

13 I did not inquire as to Backertop's finances or
14 banking accounts or anything of that nature before the
15 proceedings began, so I had no knowledge of that prior.

16 But it's a good faith -- in our estimation, it
17 was a good faith claim, good faith basis for filing the
18 suits. We had a plaintiff that owned patents. We had
19 defendants that we had good faith claim of infringement.
20 So we considered it fair basis for filing.

21 **THE COURT:** Anything else you want to say?

22 **MR. BURNS:** No, Your Honor.

23 **THE COURT:** Okay. Thank you.

24 Mr. Chong?

25 **MR. CHONG:** No, Your Honor.

1 **THE COURT:** All right. I need to look further
2 into this and think about it more. You're invited, if you
3 want, either of you, to submit any briefing.

4 I've already raised in, I'll call them parallel
5 hearings, concerns I have. I've articulated some further
6 concerns because I think some of the testimony here has
7 only added to the concerns.

8 And I guess we're adjourned.

9 (The proceedings concluded at 11:21 a.m.)

FOR THE DISTRICT OF DELAWARE

CREEKVIEW IP LLC,

Plaintiff,

V.

SKULLCANDY INC.,

Defendant.

C.A. No. 22-427-CFC

JURY TRIAL DEMANDED

DEFENDANT SKULLCANDY INC.'S RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, Defendant Skullcandy Inc. hereby states that it is a privately held corporation, wholly owned by MRSK Hold Co., and no publicly held corporation owns 10% or more of its stock.

Dated: May 25, 2022

BARNES & THORNBURG LLP

/s/ *Chad S.C. Stover*

Chad S.C. Stover (No. 4919)

1000 North West Street, Suite 1500

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Tel: (302) 300-3434

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Email: chad.stover@btlaw.com

Glenn R. Bronson (*pro hac vice* forthcoming)

J. Jeffrey Gunn (*pro hac vice* forthcoming)

James C. Watson (*pro hac vice* forthcoming)

TRASK BRITT P.C.

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Salt Lake City, Utah 84102

GRBronson@traskbritt.com

JGunn@traskbritt.com

JCWatson@traskbritt.com

Counsel for Defendant Skullcandy Inc.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Federal Circuit by using the appellate CM/ECF system on November 30, 2022.

A copy of the foregoing was served upon the following counsel of record by electronic mail and upon the district court by overnight delivery:

Via Email to counsel for Defendants:

Chad S.C. Stover, Barnes & Thornburg LLP, 1000 North West Street, Suite 1500, Wilmington, DE 19801, chad.stover@btlaw.com; and

Glenn R. Bronson, J. Jeffrey Gunn, and James C. Watson, Trask Britt P.C., 230 South 500 East, Suite 300, Salt Lake City, UT 84101, GRBronson@traskbritt.com, JGunn@traskbritt.com, JCWatson@traskbritt.com

Anne Shae Gaza, Young, Conaway, Stargatt & Taylor LLP, Rodney Square, 1000 North King Street, Wilmington, DE 19801, agaza@ycst.com

Via Overnight Delivery to the Court:

The Honorable Colm F. Connolly
J. Caleb Boggs Federal Building
844 N. King Street
Unit 31
Room 4124
Wilmington, DE 19801-3555

November 30, 2022

/s/ David R. Bennett

DAVID R. BENNETT

Direction IP Law

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dbennett@directionip.com