

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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JIAWEI TECHNOLOGY (HK) LTD., JIAWEI TECHNOLOGY (USA) LTD.,  
SHENZHEN JIAWEI PHOTOVOLTAIC LIGHTING CO., LTD., ATICO  
INTERNATIONAL (ASIA) LTD., ATICO INTERNATIONAL USA, INC.,  
CHIEN LUEN INDUSTRIES CO., LTD., INC. (CHIEN LUEN FLORIDA),  
CHIEN LUEN INDUSTRIES CO., LTD., INC. (CHIEN LUEN CHINA),  
COLEMAN CABLE, LLC, NATURE'S MARK, RITE AID CORP., SMART  
SOLAR, INC., AND TEST RITE PRODUCTS CORP.

Petitioner,

v.

SIMON NICHOLAS RICHMOND

Patent Owner.

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IPR Case No.: IPR2014-00936 (U.S. Patent No. 7,196,477)

IPR Case No.: IPR2014-00938 (U.S. Patent No. 7,429,827)

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Before JUSTIN T. ARBES, Administrative Patent Judge  
BARRY L. GROSSMAN, Administrative Patent Judge  
WILLIAM V. SAINDON, Administrative Patent Judge

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

## **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to the Board's December 22, 2014, Scheduling Order and 37 CFR § 42.70 (a), Patent Owner respectfully requests oral argument, currently scheduled on September 21, 2015.

### **Relationship to Other Proceedings**

Patent Owner notes that related proceedings (IPR2014-00935 ('935 IPR), IPR2014-00936 ('936 IPR) and IPR2014-00938 ('938 IPR)) also have oral argument scheduled for the same day. Petitioner and Patent Owner agreed to consolidate the hearings for the '938 and '936 IPRs due to similarities, but agreed that the '935 oral argument should remain separate. Therefore, the parties request a 4-hour oral argument—two hours for each party. Patent Owner further requests that the time allotted to each side (i.e., 2-hours) be equally divided between the '935 IPR oral argument and the combined '936/'938 IPRs oral argument, i.e., 1-hour per side per oral argument.

### **Issues For Hearing**

Pursuant to 37 C.F.R. § 42.70, Patent Owner specifies the following issues to be argued, without intent to waive consideration of any allowable issue not requested:

- I. The level of skill in the art.

- II. Issues related to any motion to exclude evidence and/or Patent Owner's motion to terminate the proceedings for Petitioner's failure to identify Southwire Company, LLC as a real party-in-interest.
- III. The patentability of claims 1–29 of U.S. Patent No. 7,196,477 over the references cited in Case No. IPR2014-00936.
- a. Claims 1, 2, 4–9, 20–22, and 26 are nonobvious in view of Chliwnyj, Wu, and Hung
  - b. Claims 10–12, 23–25, and 27–29 are nonobvious in view of Chliwnyj, Wu, Hung and Pu
  - c. Claims 3 and 13–16 are nonobvious in view of Chliwnyj, Wu, Hung and Xu
  - d. Claims 17–19 are nonobvious in view of Chliwnyj, Wu, Hung, Xu, and Pu
- IV. The patentability of claims 24–30 and 35 of U.S. Patent No. 7,429,827 over the references cited in Case No. IPR2014-00938.
- a. Claims 24–26 are nonobvious in view of Chliwnyj, Wu, Pu, and Dowling
  - b. Claims 27–29 and 35 are nonobvious in view of Chliwnyj and Wu
  - c. Claim 30 is nonobvious in view of Chliwnyj, Wu, and Lau

- V. Any issues noted in Petitioner's request for oral argument or otherwise raised by the Board.

**Additional Requests**

Patent Owner requests the availability of a video projector with VGA-type interface and an easel for holding poster boards, as well as permission to use a laptop computer that Patent Owner will provide.

Patent Owner additionally requests permission to present handouts of demonstrative exhibits during the oral argument.

Dated: August 19, 2015

Respectfully submitted,

/Theodore F. Shiells/  
Theodore F. Shiells  
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### **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. §§ 42.6(e)(4)(i) *et seq.* and 42.105(b), the undersigned certifies that on August 19, 2015, a copy of the **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served on Lead and Backup Attorneys for Petitioner, via the consented to method of email to the following email addresses:

mark.nelson@dentons.com, lissi.mojica@dentons.com,

kevin.greenleaf@dentons.com, daniel.valenzuela@dentons.com, and

iptdocketchi@dentons.com,

Dated: August 19, 2015

Respectfully submitted,

\_\_\_\_\_/Theodore F. Shiells/\_\_\_\_\_

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