

IN THE 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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Case IPR2014-00938  
Patent 7,429,827

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT  
UNDER 37 C.F.R. § 42.70**

Petitioner respectfully requests oral argument in the IPR2014-00938 ('938 IPR) under 37 C.F.R. §42.70(a). Pursuant to the Scheduling Order dated December 22, 2014 (Paper 21), oral argument is currently scheduled for September 21, 2015 (Paper 21, Due Date 7).

Oral argument will focus on the patentability of the challenged claims of U.S. Patent No. 7,429,827 ("the '827 Patent"). And Petitioner specifies the following principal issues to be argued, without intent to waive consideration of any allowable issue not requested or raised by the Patent Owner:

1. Claims 24-26 as obvious in view of Chliwnyj (U.S. Patent No. 5,924,784, Exhibit 1005), Wu (U.S. Patent Pub. No. 2003/0201874, Exhibit 1006), Pu (CN 2522722Y, Exhibits 1007-1009) and Dowling (U.S. Patent No. 7,064,498, Exhibit 1010).
2. Claims 27-29 and 35 as obvious in view of Chliwnyj and Wu.
3. Claim 30 as obvious in view of Chliwnyj, Wu and Lau (U.S. Patent No. 6,431,719, Exhibit 1011).

Petitioner notes that related proceedings (IPR2014-00935 ('935 IPR) and IPR2014-00936 ('936 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.

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

Respectfully submitted,

DENTONS US LLP

Dated: \_\_ August 19, 2015 \_\_\_\_\_

\_\_\_\_\_/Kevin Greenleaf/\_\_\_\_\_

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the PETITIONER’S REQUEST FOR ORAL ARGUMENT for Inter Partes Review of U.S. Patent No. 7,429,827 was served on the Counsel for the Patent owner via email to the following email addresses:

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Respectfully submitted,

Dated: \_\_August 19, 2015\_\_\_\_      \_\_\_/Nona Durham/\_\_\_\_\_

Nona Durham