

BEFORE THE PATENT TRIAL AND APPEAL BOARD
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Trial No.: IPR 2015-01644
In re: U.S. Patent No. 6,785,065
Patent Owner: Toshiba Samsung Storage Technology Korea Corporation
Petitioners: LG Electronics, Inc., and LG Electronics U.S.A., Inc.
Inventors: Byung-youn Song and Kyung-sik Shin

For: OPTICAL PICKUP ACTUATOR DRIVING METHOD AND APPARATUS
THEREFOR

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August 29, 2016

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner Toshiba Samsung Storage Technology Korea Corporation hereby requests an oral argument on the issues set forth below at a time set by the Board. Oral argument is presently scheduled for October 6, 2016.

Patent Owner respectfully requests 30 minutes of total argument time in which to present arguments on the issues listed below.

ISSUES TO BE ARGUED

- I. Whether claims 1-2 and 5-9 are unpatentable as obvious under 35 U.S.C. § 103(a) over Akanuma and the Admitted Prior Art (APA).
- II. Whether claims 1-2 and 5-9 are unpatentable as obvious under 35 U.S.C. § 103(a) over Akanuma, the APA, and Ikegame.
- III. Whether claims 3-4 are unpatentable as obvious under 35 U.S.C. § 103(a) over Akanuma, the APA, and Wakabayashi.
- IV. Whether claims 3-4 are unpatentable as obvious under 35 U.S.C. § 103(a) over Akanuma, the APA, Ikegame, and Wakabayashi.
- V. Patent Owner's responses to and addressing of: new claim interpretations, new arguments, new inherency allegations, new § 103 modifications, and new obviousness rationales set forth in Petitioners' Reply Brief dated July 29, 2016.
- VI. All instituted grounds.
- VII. All arguments and issues in Patent Owner's Response.

Patent Owner also respectfully requests the ability to use audio visual equipment to display possible demonstrative exhibits, including the use of a projector and screen.

Respectfully submitted,

NIXON & VANDERHYE P.C.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Patent Owner's Request for Oral Argument was served on Petitioners LG Electronics, Inc. and LG Electronics, U.S.A., Inc. on August 29, 2016 by emailing a copy to counsel at the email addresses listed below:

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