Filed on behalf of: LG Electronics, Inc. and LG Electronics U.S.A., Inc.

Paper \_\_\_\_

By: Brian A. Tollefson, Lead Counsel Date filed: August 29, 2016

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## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC. and LG ELECTRONICS U.S.A., INC., Petitioner,

v.

TOSHIBA SAMSUNG STORAGE TECHNOLOGY KOREA CORPORATION, Patent Owner.

Case IPR2015-01644 Patent 6,785,065 B1

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



Mail Stop PATENT BOARD Patent Trial and Appeal Board U.S. Patent & Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

Pursuant to the Scheduling Order, dated February 1, 2016 (Paper No. 10), and Notice of Stipulation to Extend Due Dates 2, 4, and 5, filed June 28, 2016 (Paper No. 22), Petitioners LG Electronics, Inc. and LG Electronics U.S.A., Inc. ("Petitioner") respectfully request oral argument on the issues set forth below. The Oral Hearing is scheduled to be held on October 6, 2016. Paper No. 28.

Petitioner submits that 45 minutes of oral argument per side will be adequate to present arguments on the issues listed below.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner identifies the following issues as among those to be argued:

- 1. The unpatentability of claims 1, 2, and 5-9 under 35 U.S.C. § 103(a) over Akanuma (Ex. 1002) and the Admitted Prior Art ("APA") (Ex. 1001).
- 2. The unpatentability of claims 1, 2, and 5-9 under 35 U.S.C. § 103(a) over Akanuma, the APA, and Ikegame (Ex. 1005).
- 3. The unpatentability of claims 3 and 4 under 35 U.S.C. § 103(a) over Akanuma, the APA, and Wakabayashi (Ex. 1007).



- 4. The unpatentability of claims 3 and 4 under 35 U.S.C. § 103(a) over Akanuma, the APA, Ikegame, and Wakabayashi.
- 5. All arguments and issues in the Petition and cited exhibits.
- 6. All arguments and issues in Patent Owner's Response and cited exhibits.
- 7. All arguments and issues in Petitioner's Reply to Patent Owner's Response and cited exhibits.

Petitioner requests the ability to use audio/visual equipment to display demonstrative exhibits and evidence of record, including the use of a projector and screen for a PowerPoint presentation and other visual display.

## Respectfully submitted,

Dated: August 29, 2016 By: / Michael V. Battaglia /

Brian A. Tollefson, Reg. No. 46,338 Michael V. Battaglia, Reg. No. 64,932 Steven Lieberman, *Pro Hac Vice* Michael H. Jones, *Pro Hac Vice* ROTHWELL, FIGG, ERNST & MANBECK, P.C. 607 14<sup>th</sup> Street, N.W., Suite 800 Washington, DC 20005

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Counsel for Petitioners LG Electronics, Inc. and LG Electronics U.S.A., Inc.



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>nd</sup> day of August, 2016, a true and correct copy of the foregoing PETITIONER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70(a) was served, via electronic mail upon the following counsel of record for Patent Owner Toshiba Samsung Storage Technology Korea Corporation:

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<u> / Erik va</u>n Leeuwen /

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