

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DONGHEE AMERICA, INC. and DONGHEE ALABAMA, LLC,
Petitioners

v.

PLASTIC OMNIUM ADVANCED INNOVATION AND RESEARCH,
Patent Owner

IPR2017-01633 (U.S. Patent 6,866,812)

IPR2017-01647 (U.S. Patent 6,814,921)

IPR2017-01654 (U.S. Patent 9,079,490)

Petitioners' Request for Oral Argument

Petitioners Donghee America, Inc. and Donghee Alabama, LLC hereby request oral argument pursuant to 37 C.F.R. § 42.70, the Board's Scheduling Orders and Conduct of the Proceedings entered in IPR2017-01633, -01647, and -01654.

The oral argument in each proceeding is scheduled for October 22, 2018. Petitioners and Patent Owner have met and conferred regarding the scheduling of the oral argument in IPR2017-01654 regarding U.S. Patent 9,079,490 ("490 patent"). The parties agree that, because the subject matter of the '490 patent is more closely related to the patents-at-issue in IPR2017-01890 and -01945 than the patents-at-issue in IPR2017-01633 and -01647, it may be beneficial to the Board if the oral argument in IPR2017-01654 is continued to November 5, 2018 (the same day as oral arguments in IPR2017-01890 and -01945). Accordingly, Petitioners request that the oral argument in IPR2017-01654 be continued to November 5, 2018. Petitioners' understand that Patent Owner intends to make a similar request to continue the oral argument in IPR2017-01654.

Petitioners intend to discuss the issues raised in the parties' filings, including but not limited to, the following items:

1. The unpatentability of claims 16, 24-27, 30-32, 38-41, 44, and 45 of U.S. Patent 6,866,812 based on the instituted grounds;

2. The unpatentability of claims 1-5, 8, and 9 of U.S. Patent 6,814,921 based on the instituted grounds;
3. The unpatentability of claims 1, 2, 7-9, and 12-14 of U.S. Patent 9,079,490 based on the instituted grounds (in the event that the request to continue oral argument on this patent is not granted);
4. Rebuttal to Patent Owner's presentation on all matters; and
5. Any other issues that the Board deems necessary for issuing a final written decision.

Given the unique issues pertaining to each of the patents, Petitioners request that each side be given 60 minutes to present its arguments (40 minutes if the request to continue is granted) and request that Petitioners be permitted to reserve time to be the last party to present rebuttal arguments. Petitioners also request the ability to use computers and audio/visual equipment to display demonstrative exhibits and evidence, including the use of a projector and screen.

Dated: September 17, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) of this document on counsel of record for Patent Owner by filing it on the PTAB E2E System as well as delivering a copy via email to their email addresses:

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*Attorneys for Plastic Omnium Advanced
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Dated: September 17, 2018

By: /Anita Chou/
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