

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG
ELECTRONICS AMERICA, INC.
Petitioners

v.

MANUFACTURING RESOURCES INTERNATIONAL, INC.
Patent Owner

Case IPR2023-00220
Patent 9,173,322

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order (Paper 13), Patent Owner Manufacturing Resources International, Inc. (“Patent Owner”) requests that the Board hear oral argument in this matter.

Requests for Oral Argument

The Scheduling Order sets March 21, 2024 as the date for oral argument. Oral Argument is scheduled for related Proceeding No. IPR2023-00199 challenging U.S. Patent No. 8,854,595 to occur on the same date. Patent Owner hereby notifies the Board that it intends to have more than five attendees for the oral argument.

Patent Owner requests:

1. that the oral argument be conducted in person at the USPTO headquarters in Alexandria, Virginia;
2. that the oral argument be consolidated to address this proceeding and IPR2023-00199;
3. that it be given ninety (90) minutes, to present its arguments for both proceedings; and
4. the use of a projector to display demonstratives during Argument.

Issues for Argument

Patent Owner specifies the following issues to be argued:

1. Whether Petitioner has carried its burden of establishing that any challenged claim of U.S. Patent No. 9,173,322 is obvious in view of Kim (Ex. 1005) in

combination with Hong (Ex. 1029) alone or in further combination with Tachikawa (Ex. 1026) or Takahashi (Ex. 1008);

2. Whether Petitioner has carried its burden of establishing that any challenged claim of U.S. Patent No. 9,173,322 is obvious in view of Kim (Ex. 1005) in combination with Tachikawa (Ex. 1026);

3. Whether Petitioner has carried its burden of establishing that any challenged claim of U.S. Patent No. 9,173,322 is obvious in view of Na (Ex. 1005) alone or in combination with Kim (Ex. 1005) or Tachikawa (Ex. 1026);

4. Whether Petitioner has carried its burden of establishing that any challenged claim of U.S. Patent No. 9,173,322 is obvious in view of Kimura (Ex. 1004) alone or in combination with Kochiyama (Ex. 1028) or Hong (Ex. 1026);

5. Whether Petitioner has carried its burden of establishing that any challenged claim of U.S. Patent No. 9,173,322 is obvious in view of Kimura (Ex. 1004) in view of Hong (Ex. 1026) and Kochiyama (Ex. 1028);

6. Whether Petitioner has carried its burden of establishing that any challenged claim of U.S. Patent No. 9,173,322 is obvious in view of Cho (Ex. 1006) alone;

7. The appropriate weight to be accorded to the expert testimony and other evidence presented by each party;

8. The appropriate weight to be accorded to the Initial Determination of the International Trade Commission in *In re Certain Outdoor and Semi-Outdoor Electronic Displays, Products Containing Same, and Components Thereof*, Investigation No. 337-TA-1331;

9. Whether secondary considerations of non-obviousness confirm non-obviousness of any of the challenged claims;

10. Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed or filed concurrently; and

11. Any outstanding motions and pleadings, and other issues that the Board raises or deems necessary for issuing a Final Written Decision.

Dated: February 5, 2024

By: /John C. Alemanni/
John C. Alemanni
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Counsel for Patent Owner

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below a copy of this
PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was served on
Petitioner by filing through the P-TACTS System, as well as by delivering a copy
via electronic mail to the following:

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Dated: February 5, 2024

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