

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

U.S. Patent No. 10,506,740

Title: ELECTRONIC DISPLAY WITH COOLING

Inter Partes Review No. IPR 2023-00254

PETITIONERS' REQUEST FOR ORAL ARGUMENT

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

Pursuant to 37 C.F.R. § 42.70, Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”) respectfully request oral argument on issues related to the instituted grounds and on any issues raised in any pending motions or briefing filed by the parties. The scheduling order (Paper No. 12) slates oral argument for March 20, 2024.

Samsung specifies, without intent to waive consideration of any issue not requested, the following non-exclusive list of issues to be argued:

1. Invalidity of all challenged claims, 1–3, 5–9, 11–13, 15–18, and 20;
2. Any issues identified in Patent Owner’s Request for Oral Argument;
3. Any issue raised in papers filed in this proceeding, including issues raised in papers yet to be filed, such as any Motions to Exclude and Oppositions to Motions to Exclude;
4. Any procedural or evidentiary issues raised;
5. Any additional issue on which the Board seeks clarification or deems necessary for issuing a final written decision.

Samsung reserves the right to supplement and/or amend this statement of issues to the extent permitted by the Board and/or any applicable rules.

Samsung respectfully proposes that the oral argument in this proceeding be combined with the oral argument in IPR2023-00221, which is also scheduled to

occur on March 20, 2024 pursuant to the scheduling order in that proceeding (Paper No. 12).

Samsung respectfully proposes that Samsung and Patent Owner each be provided 90 minutes of argument time for the combined hearing in this proceeding and IPR2023-00221, inclusive of any rebuttal time either party wishes to reserve at the hearing.

Samsung and Patent Owner met and conferred, and agree the hearing should be held in person at the USPTO headquarters in Alexandria, Virginia. Samsung requests the ability to display demonstratives and exhibits during the hearing.

Samsung also requests rebuttal to respond to all issues raised by Patent Owner's argument.

Samsung expects to have five or more people in attendance at the argument.

Date: February 6, 2024

Respectfully submitted,

By: /Sanjeet K. Dutta/

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Counsel for Petitioners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) the undersigned hereby certifies that Petitioners' Request for Oral Argument was served on counsel for Patent Owner upon the following addresses as listed in Patent Owner's Mandatory Notices:

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Respectfully submitted,
GOODWIN PROCTER LLP

Date: February 6, 2024

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