

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 IPR2023-00255
Patent 9,629,287

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order (Paper 12), Patent Owner Manufacturing Resources International, Inc. (“Patent Owner”) requests that the Board hear oral argument in this matter.

The Scheduling Order sets April 24, 2024, as the date for oral argument. Patent Owner requests: (1) that the oral argument be conducted in person at the USPTO headquarters in Alexandria, Virginia; (2) that it be given sixty (60) minutes, to present its arguments for this proceeding; and (3) the use of a projector to display demonstratives during Argument. Patent Owner expects to have five or more people in attendance at the argument.

Patent Owner specifies the following issues to be argued:

1. Whether Petitioners have carried their burden of establishing that any of claims 12-23 of the '287 Patent is obvious in view of Karppanen (Ex. 1006);
2. Whether Petitioners have carried their burden of establishing that any of claims 1, 4-5, 8-12, 14-17, and 21-23 of the '287 Patent is obvious in view of Nagashima (Ex. 1007) in view of Karppanen (Ex. 1006);
3. Whether Petitioners have carried their burden of establishing that any of claims 1, 4-5, and 8-23 of the '287 Patent is obvious in view of Ohta (Ex. 1004) in view of Marumoto (Ex. 1005);

4. Whether Petitioners have carried their burden of establishing that any of claims 1, 4-5, and 8-23 of the '287 Patent is obvious in view of Ohta (Ex. 1004) in view of Marumoto (Ex. 1005) and in further view of Yare (Ex. 1013);

5. Whether Petitioners have carried their burden of establishing that any of claims 12-20 of the '287 Patent is obvious in view of Kitamura (Ex. 1017) in view of Harris (Ex. 1018);

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

7. 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;

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

9. All issues raised in Petitioners' request for oral hearing; and

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

Dated: February 27, 2024

By: /John C. Alemanni/
John C. Alemanni
Reg. No. 47,384
Counsel for Patent Owner

KILPATRICK TOWNSEND & STOCKTON LLP

4208 Six Forks Road, Suite 1400

Raleigh, NC 27609

Tel: (919) 420-1700

Fax: (919) 420-1800

jalemanni@kilpatricktownsend.com

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:

Sanjeet Dutta – sdutta@goodwinlaw.com
Douglas J. Kline – dkline@goodwinlaw.com
Srikanth Reedy – sreddy@goodwinlaw.com
Naomi L. Birbach – nbirbach@goodwinlaw.com

Dated: February 27, 2024

By: /John C. Alemanni/
John C. Alemanni
Reg. No. 47,384
Counsel for Patent Owner