

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANON U.S.A., INC. and CANON INC.,

Petitioners,

v.

SLINGSHOT PRINTING LLC,

Patent Owner.

Case No. IPR2023-00313

Patent No. 7,594,708

Before JO-ANNE M. KOKOSKI, GARTH D. BAER, and JOHN D. HAMANN,
Administrative Patent Judges.

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's August 1, 2023, Scheduling Order (Paper 7) (the "Scheduling Order"), Petitioners Canon U.S.A., Inc. and Canon Inc. ("Canon") respectfully request oral argument in connection with this proceeding (IPR2023-00313).

Petitioners further request that the oral argument take place on May 15, 2024, and that this oral argument be consolidated with related proceeding IPR2023-00312. Per the Scheduling Order, oral argument is scheduled for May 9, 2024. Currently, the parties and the Board have three proceedings set for oral argument that day: IPR2023-00309, IPR2023-00312, and IPR2023-00313. Given (i) this scheduling conflict, (ii) the fact that IPR2023-00312 and IPR2023-00313 involve related patents, with the same inventors, nearly identical specifications, and overlapping prior art and grounds, and (iii) there will be insufficient time to address all the issues in each of the IPRs in a single hearing, Petitioners request that the Board consolidate the oral hearings for IPR2023-00312 and IPR2023-00313 and move that combined hearing to May 15, if available.

Because this consolidated hearing will address the unpatentability of two patents, Petitioners request seventy-five (75) minutes in which to present its arguments for both IPR proceedings.

Petitioner requests the hearing take place remotely via videoconference.

To comply with 37 C.F.R. § 42.70(a)'s requirement that this request "must

specify the issues to be argued,” and without waiving argument on any issue not specifically identified below, Petitioner specifies at least the following issues to be argued:

- That per 35 U.S.C. § 103, claims 1–3, 5–12, 14, 15 are obvious in view of U.S. Patent No. 7,384,113 (“Benjamin”) and U.S. Patent No. 6,612,673 (“Giere673”);
- That per 35 U.S.C. § 103, claims 4 and 13 are obvious in view of Benjamin, Giere673, and U.S. Patent No. 7,163,272 (“Parish”);
- That per 35 U.S.C. § 103, claims 1–3, 5–12, 14, 15 are obvious in view of U.S. Patent No. 6,565,178 (“Giere178”);
- That per 35 U.S.C. § 103, claims 1–3, 5–12, 14, 15 are obvious in view of Giere178 and U.S. Patent No. 6,527,367 (“Yabe”);
- That per 35 U.S.C. § 103, claims 4 and 13 are obvious in view of Giere178 and Parish;
- That per 35 U.S.C. § 103, claims 4 and 13 are obvious in view of Giere178, Yabe, and Parish;
- Any claim constructions, unpatentability grounds, or other issues raised in the Petition or Petitioners’ Reply, the Patent Owner Preliminary Response, the Patent Owner Response, the Patent Owner Sur-Reply, or the Board’s Institution Decision;
- Rebuttal to issues raised by Patent Owner;

- Any other motions filed by either party; and
- Any other issues that the Board deems necessary for issuing a final written decision in this proceeding.

Dated: March 20, 2024

Respectfully Submitted,

/ Dion M. Bregman /

Dion M. Bregman, Reg. No. 45,645

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), it is hereby certified that on March 20, 2024, an electronic copy of this PETITIONERS' REQUEST FOR ORAL ARGUMENT, was served via email to Patent Owner's counsel of record in this proceeding:

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Dated: March 20, 2024

/ Dion M. Bregman /
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