

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WESTERN DIGITAL TECHNOLOGIES, INC.,

Petitioner

v.

SHAMROCK INNOVATIONS, LLC,

Patent Owner

Case No.: IPR2023-00842

U.S. Patent No. 9,535,454

PATENT OWNER'S REQUEST FOR ORAL HEARING

Pursuant to 37 C.F.R. § 42.70, and the Board's Scheduling Order, dated October 19, 2023, Patent Owner hereby requests an oral argument in the present *inter partes* review. Per the Board's Scheduling Order, the oral argument is currently scheduled for July 17, 2024. Scheduling Order, Paper 10, p. 11.

Patent Owner does not object to Petitioner's request for the hearing to be held in person in Alexandria, VA at the United States Patent and Trademark Office. If Petitioner's request for in-person hearing is granted, Patent Owner requests appropriate computer equipment to display PowerPoint slides of Exhibits and Demonstrative Exhibits.

Patent Owner agrees with Petitioner that each side should have a total of one (1) hour to present oral argument at the hearing.

If Petitioner's request for in-person hearing is granted, Patent Owner requests appropriate computer equipment to display PowerPoint slides of Exhibits and Demonstrative Exhibits. Patent Owner expects two people to attend for Patent Owner, if the Oral Hearing is conducted in person and the Board can accommodate this number of attendees for Patent Owner.

Patent Owner respectfully requests the opportunity to present oral arguments on all issues raised in the papers pertaining to the instituted grounds, including:

- how Petitioner has failed to meet its burden with respect to challenged claims 1-4, 6-7 and 15-17 in view of the proposed combinations of Vangemert and Copeland (Ground 1), Vangemert, Copeland and Dobson (Ground 2), Vangemert, Copeland and Reay (Ground 3), Dobson and Copeland (Ground 4), Dobson, Copeland and Reay (Ground 5) and Dobson, Copeland and Vangemert (Ground 6) as presented in the Petition (Paper 2);
- any issue raised in the Board's Institution Decision (Paper 9);
- any argument raised in the Petition (Paper 2), Patent Owner's Response (Paper 13), Petitioner's Reply (Paper 15), and Patent Owner's Sur-reply (Paper 18), including the parties' prior art arguments;
- any issue raised in any paper of record in this proceeding;
- any issue raised by Petitioner in its request for oral argument; and
- any issue raised by the Board during the oral argument or for which the Board seeks clarification.

If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference.

Date: June 5, 2024

Respectfully submitted,

By: /Brandon R. Thiess/
Brandon R. Thiess,
USPTO Reg. No. 70,507
Volpe Koenig

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL HEARING** was served via email (as consented to by counsel) on **June 5, 2024** to lead and backup counsel of record for Petitioner as follows:

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Dated: June 5, 2024

By: /Brandon R. Theiss/
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