

Filed on behalf of BeSang Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.,
MICRON SEMICONDUCTOR PRODUCTS, INC., and
MICRON TECHNOLOGY TEXAS, LLC,
Petitioners,

v.

BESANG INC.,
Patent Owner.

Case No. IPR2023-00900
U.S. Patent No. 7,378,702

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order (Paper 10), Patent Owner BeSang Inc. (“BeSang”) requests oral argument on all instituted grounds of unpatentability in the above-captioned IPR.

BeSang requests 30 minutes per side for the oral argument currently scheduled for August 22, 2024. *See* Paper 10 at 11.

BeSang requests an in-person oral argument at USPTO headquarters in Alexandria, Virginia. BeSang also requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen, or suitable alternative.

The parties have conferred and were unable to reach agreement on the hearing length or location. Petitioner states it requests a video hearing with 60-minutes of argument per side.

Pursuant to 37 C.F.R. § 42.70, and without intent to waive consideration of any issue not requested, BeSang specifies the issues to be argued as the grounds of unpatentability instituted by the Board (Paper 9), including:

1. Obviousness of Claim 13 over Watanabe as specified in Ground 1;
2. Obviousness of Claims 14-17 over Watanabe in view of Endoh as specified in Ground 2;
3. Obviousness of Claims 13-15 over Lee as specified in Ground 3;

4. Obviousness of Claims 16-17 over Lee in view of Endoh as specified in Ground 4;

5. Obviousness of Claims 13-15 over Lee in view of Watanabe as specified in Ground 5;

6. Obviousness of Claims 16-17 over Lee in view of Watanabe and Endoh as specified in Ground 6; and

7. All issues raised by Petitioners in their Request for Oral Argument or at the oral hearing, and responses thereto.

ARMOND WILSON LLP

Dated: July 3, 2024

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PATENT OWNER’S REQUEST FOR ORAL ARGUMENT** is being served electronically on July 3, 2024 to the following counsel for Petitioners to the following email addresses:

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