

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MIANYANG BOE OPTOELECTRONICS TECHNOLOGY CO., LTD.;
WUHAN CHINA STAR OPTOELECTRONICS SEMICONDUCTOR
DISPLAY TECHNOLOGY CO., LTD.; TIANMA MICROELECTRONICS
CO., LTD.; AND VISIONOX TECHNOLOGY, INC.,
Petitioner,

v.

SAMSUNG DISPLAY CO., LTD.
Patent Owner.

Case IPR2023-00941
U.S. Patent No. 7,414,599

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper No. 13), Patent Owner requests the opportunity to present oral argument regarding the patentability of the challenged claims of U.S. Patent No. 7,414,599 at issue in this proceeding. Patent Owner requests to present arguments on the following issues:

- (1) Whether Petitioner has established a *prima facie* case of obviousness of the challenged claims based on Kimura;
- (2) Whether objective evidence supports the non-obviousness of the challenged claims;
- (3) Rebuttal to Petitioner's presentation on all matters;
- (4) Any other issues raised by the parties in the papers filed in this proceeding; and
- (5) Any other issues that the Board deems necessary for issuing a final written decision.

Patent Owner respectfully requests 45 minutes per side of argument time per side. In light of the Board's guidance in its Decision on Institution (Paper 12) and Order Denying Petitioner's Motion to Submit Supplemental Information (Paper 27), Patent Owner believes this will provide sufficient time to address the foregoing issues.

Patent Owner requests that the oral argument be conducted virtually by videoconference. If the Board agrees to conduct the oral argument virtually, Patent

Owner requests the ability to present demonstratives and exhibits to the Board remotely. Further, Patent Owner requests the ability to have additional counsel (including backup counsel) and one or more client representatives attend the argument from separate locations.

Consistent with the Trial Practice Guide, Patent Owner met and conferred with Patent Owner about this request. Patent Owner advised Petitioner that it intended to request 45 minutes per side of argument time, and to request that the argument be held virtually. Petitioner indicated that it would request a generally similar amount of time per side.

Under the Board's Scheduling Order (Paper No. 13), the oral argument is scheduled for September 16, 2024.

Date: August 2, 2024

Respectfully submitted,

By /David A. Garr/

David A. Garr

Registration No.: 74,932

Scott C. Weidenfeller

Registration No.: 54,531

Jared R. Frisch (*pro hac vice pending*)

Derek J. Andros (*pro hac vice pending*)

Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that the foregoing Patent Owner's Request for Oral Argument was served by electronic mail on the following counsel of record for petitioner:

Travis Jensen (T61PTABDocket@orrick.com)
Johannes Hsu (PTABDocketJ1H1@orrick.com)
Xiang Wang (XW0PTABDocket@orrick.com)
ORRICK, HERRINGTON & SUTCLIFFE, LLP

Date: August 2, 2024

/David A. Garr/
David A. Garr
Registration No.: 74,932