

Filed on behalf of BeSang Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION,
Petitioner,

v.

BESANG INC.,
Patent Owner.

Case No. IPR2023-00991
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 13), Patent Owner BeSang Inc. (“BeSang”) requests oral argument on all instituted grounds of unpatentability in the above-captioned IPR.

BeSang requests 60 minutes per side for the oral argument scheduled for September 18, 2024. *See* Paper 13 at 11.

BeSang requests in-person 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 conferred and agreed on 60 minutes of argument per side, but were not able to reach agreement on the hearing location (Petitioner requests a video hearing).

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 12), including:

1. Obviousness of Claims 13-17 over Lee as specified in Ground 1A;
2. Obviousness of Claims 16-17 over Lee in view of Endoh as specified in Ground 1B;
3. Obviousness of Claims 13-17 over Lee in view of Kim as specified in Ground 1C;

4. Obviousness of Claims 16-17 over Lee in view of Kim and Endoh as specified in Ground 1D;
5. Obviousness of Claims 13-17 over Lee in view of Aspar as specified in Ground 1E;
6. Obviousness of Claims 16-17 over Lee in view of Aspar and Endoh as specified in Ground 1F;
7. Obviousness of Claim 13 over Johnson as specified in Ground 2A;
8. Obviousness of Claim 13 over Johnson in view of Kim as specified in Ground 2B;
9. Obviousness of Claim 13 over Johnson in view of Aspar as specified in Ground 2C;
10. Obviousness of Claim 1 over Park in view of Kim as specified in Ground 3; and
11. All issues raised by Petitioner in its Request for Oral Argument or at the oral hearing and responses thereto.

ARMOND WILSON LLP

Dated: July 24, 2024

By: /Michelle E. Armond/

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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 24, 2024 to the following lead counsel for Petitioner to the following email addresses:

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ARMOND WILSON LLP

Dated: July 24, 2024

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