

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. and
APPLE INC.,¹
Petitioners,

v.

RJ TECHNOLOGY LLC,
Patent Owner.

Case IPR2023-01183
U.S. Patent No. 7,749,641 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ Apple Inc. was joined as a petitioner in this proceeding based on a petition and motion for joinder filed in IPR2024-00597, which was granted.

Pursuant to 37 C.F.R. § 42.70 and the Board's January 22, 2024 Scheduling Order (Paper 9), RJ Technology LLC ("Patent Owner") respectfully requests oral argument, scheduled for October 22, 2024. Patent Owner requests that oral argument be held virtually by videoconference.

Reservation Of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund., Ltd. et al. v. VirnetX Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.")

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, anticipation, obviousness, enablement of the prior art, motivation to combine, and reasonable expectation of success;
- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and

- Any other issues that the Board deems necessary for issuing a Final Written Decision, including any questions, rebuttals, or arguments that may arise during the oral argument.

The Board's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 60 minutes of total argument time per side. Patent Owner believes that this is a sufficient amount of time to discuss all issues in this case.

Equipment: Patent Owner requests link(s) to a teleconference platform (e.g., Zoom, Teams, etc.) with the ability to display possible demonstratives and exhibits during the remote hearing.

LEAP Practitioner Participation Request: Patent Owner anticipates it will submit a LEAP Practitioner Request and Certification form to PTABHearings@uspto.gov after the Board issues its Order Setting Oral Argument and at least five business days before the hearing.

Date: September 9, 2024

Respectfully submitted,

/Minghui Yang/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

The names and email addresses of the parties being served are as follows:

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Respectfully submitted,

/Minghui Yang/

Date: September 9, 2024