UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC and TEXAS INSTRUMENTS INCORPORATED,

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner

IPR2023-01242[1]
Patent 11,121,222

PETITIONER'S REQUEST FOR ORAL ARGUMENT

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[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00673, has been joined as a petitioner in this proceeding.

In accordance with 37 C.F.R. § 42.70(a), Semiconductor Components Industries, LLC ("Petitioner") hereby requests an oral argument in the present *inter partes* review. Per the Board's Scheduling Order, the oral argument is currently scheduled for November 13, 2024. Scheduling Order, Paper 33, p. 13.

Patent Owner and Petitioner have conferred regarding the format and location of the oral argument. Petitioner respectfully requests a consolidated hearing for IPR2023-01242, -01243, and 01244, with 60 minutes of oral argument per side and the opportunity to address all issues raised in the papers of IPR2023-01242, -01243, and 01244. Petitioner understands that Patent Owner does not oppose Petitioner's request.

Petitioner understands that Patent Owner intends to request that the hearing be held in-person, in Alexandria, VA. Petitioner is neutral regarding whether the hearing is held in-person or remotely, and defers to the preferences and logistics of the Board on this point.

In total, the issues include:

IPR2023-01242 (U.S. Patent 11,121,222)

- How claims 1–9, 13, 14, 16–21, 23–28, 32–42 are obvious over Kawagoe;
- How claims 1, 2, 4–9, 13–23, 25-28, 32–42 are obvious over Wieczorek and Wolf;
- How claims 1–9, 13, 14, 16–21, 23–28, 32–42 are obvious over Kawagoe

and Gupta;

- How claims 1, 2, 4–9, 13–23, 25-28, 32–42 are obvious over Wieczorek, Wolf, and Gupta;
- How claims 19 and 37 are obvious over Kawagoe and Silverbrook;
- How claims 19 and 37 are obvious over Wieczorek, Wolf, and Silverbrook;
- any other issues raised in any paper filed by the parties; and
- any responses to issues raised by the Board or Patent Owner at the oral argument.

IPR2023-01243 (U.S. Patent 10,510,842)

- How claims 1-18 are obvious over Kawagoe;
- How claims 1-3, 5-11, and 13-18 are obvious over Wieczorek and Wolf;
- How claims 1-18 are obvious over Kawagoe and Gupta;
- How claims 1-3, 5-11, and 13-18 are obvious over Wieczorek, Wolf, and Gupta;
- any other issues raised in any paper filed by the parties; and
- any responses to issues raised by the Board or Patent Owner at the oral argument.

IPR2023-01244 (U.S. Patent 11,121,222)

- How claim 44 is obvious over Payne;

- How claim 44 is obvious over Sakai and Kawagoe;
- any other issues raised in any paper filed by the parties; and
- any responses to issues raised by the Board or Patent Owner at the oral argument.

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

Dated: September 30, 2024

/Roger Fulghum/
Roger Fulghum
Reg. No. 39,678

Counsel for Petitioner
Semiconductor Components Industries, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 30th day of September, 2024, **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served by email on the following counsel for Patent Owner and the Joined Petitioner:

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