

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OPTICIS CO., LTD

Petitioner,

v.

INNEOS LLC,

Patent Owner.

Case No. IPR2023-01256
U.S. Patent No. 7,198,416

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 16), Patent Owner Inneos LLC ("Patent Owner"), respectfully request Oral Argument on all of the instituted grounds regarding U.S. Patent No. 7,198,416. Without intending to waive any issue not specifically identified, Patent Owner wishes to present arguments on all instituted grounds of unpatentability, issues raised in all substantive papers filed in the proceeding, including the Petition, the Institution Decision, Patent Owner's Response, Petitioner's Reply, Patent Owner's Sur-Reply, and any papers yet to be filed, including any motions to exclude, any arguments raised by Petitioner, and any other issues the Board deems necessary for the issuance of a final written decision.

The Board has currently scheduled the Oral Hearing for this proceeding on November 1, 2024 (Paper 16). Patent Owner will email the Board separately regarding a conflict with the scheduled date. Should the Board move forward with the Oral Hearing, Patent Owner believes that the default time for argument of one hour per side is appropriate, and requests the hearing to be in-person at the USPTO in Alexandria, VA. If the oral argument is conducted live, Patent Owner requests permission to use video equipment to display demonstrative exhibits, including the use of a projector/screen for a PowerPoint display or the like.

IPR2023-01256

U.S. Patent No. 7,198,416

Dated: September 20, 2024

Respectfully submitted,

/s/ Barry J. Herman

Barry J. Herman (Reg. No. 51,254)
Christian E. Mammen (*pro hac vice*)
Carrie Richey (*pro hac vice*)

Counsel for Patent Owner Inneos LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on September 20, 2024, that a true and correct copy of the foregoing was served on Counsel for Petitioner via filing through the P-TACTS, as well as by delivering a copy via electronic mail to the following email address(es):

Petitioner's Lead Counsel

Michael H. Jones
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Ave NW Suite 900
Washington, DC 20001
Tel: (202) 783-6040
Fax: (202) 783-6031
Email: mjones@rfem.com
USPTO Customer No. 06449
USPTO Reg. No. 76,120

Petitioner's Back-Up Counsel

Martin M. Zoltick
USPTO Reg. No. 35,745
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Ave NW Suite 900
Washington, DC 20001
Tel: (202) 783-6040
Fax: (202) 783-6031
Email: mzoltick@rfem.com

Mark T. Rawls
USPTO Reg. No. 76,376
Rothwell, Figg, Ernst & Manbeck, P.C.
901 New York Ave NW Suite 900
Washington, DC 20001
Tel: (202) 783-6040
Fax: (202) 783-6031
Email: mrawls@rfem.com

/s/ Barry J. Herman

Barry J. Herman (Reg. No. 51,254)

Lead Counsel for Patent Owner