

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Hisense USA Corporation
Petitioner

v.

Brightplus Ventures LLC
Patent Owner

IPR2023-01385
Patent No. 7,690,812

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order (Paper 10), Petitioner Hisense USA Corporation (“Petitioner”) requests that the Board hear oral argument in this matter.

The Scheduling Order (Paper 10) sets January 6, 2025, as the date for oral argument. Petitioner requests that the oral argument proceed on that date or, if the schedule is altered in view of Patent Owner’s Motion to Amend (Paper 12) or Patent Owner’s Revised Motion to Amend, if filed, on another date when the Board is available. *See* Ex. 3002 (noting that if Patent Owner files a revised motion to amend, the Oral Hearing (Due Date 8) will be held at a time the Board is available after January 23, 2025).

Petitioner requests: (1) that the oral argument be conducted in person at the USPTO Regional Office in Dallas, Texas;¹ (2) that it be given sixty (60) minutes, to present its argument; and (3) the use of a projector to display demonstratives during Argument.

Petitioner specifies the following issues to be argued:

1. Whether Original Claims 1-7, 10-12, 14-21, and 23 are obvious in view of the prior art grounds presented in the Petition.

¹ The Scheduling Order (Paper 10) specifies that “The parties may request that the oral argument be held at the Dallas Texas USPTO Regional Office or the San Jose, California USPTO Regional Office.”

2. Whether Patent Owner's Contingent Motion to Amend (Paper 12) and/or Revised Motion to Amend, if filed, complies with Section 316(d) or Rule 42.121, including whether the number of substitute claims is reasonable, whether the substitute claims respond to the grounds of unpatentability involved in the proceeding, enlarge the scope of the original claims, or violate the written description or definiteness requirements.

3. Whether Patent Owner's substitute claims are obvious in view of the prior art submitted with the Petition, Petitioner's Opposition to the Motion to Amend, and/or Opposition to the Revised Motion to Amend.

4. The appropriate weight to be accorded each parties' expert testimony.

5. All issues raised in Patent Owner's request for oral hearing.

6. Any outstanding motions, pleadings, or other issues that the Board raises or deems necessary for issuing a Final Written Decision and resolving Patent Owner's Contingent Motion to Amend and/or Revised Motion to Amend.

Dated: October 30, 2024

Respectfully submitted,

By: /s/ Michael Morlock

Michael Morlock

Registration No. 62,245

Backup Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below a copy of this
PETITIONER'S REQUEST FOR ORAL ARGUMENT was served on Patent
Owner by filing through the P-TACTS System, as well as by delivering a copy
via electronic mail to the following:

hni@nilawfirm.com
nmassand@nilawfirm.com
twang@nilawfirm.com

Dated: October 30, 2024

By: /s/ Michael Morlock
Michael Morlock
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