

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Hisense USA Corporation
Petitioner

v.

Brightplus Ventures LLC
Patent Owner

Patent No. 8,330,710
Filing Date: October 11, 2011
Issue Date: December 11, 2012
Title: Systems and Methods for Controlling a Solid State Lighting Panel

Inter Partes Review No. IPR2023-01412

PETITIONER'S REQUESTS FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order (Paper 9), Petitioner Hisense USA Corporation (“Petitioner”) requests that the Board hear oral argument in this matter.

The Scheduling Order (Paper 9) sets January 22, 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 Revised Motion to Amend (Paper 20) on another date when the Board is available. *See* Ex. Paper 9 at 5 (“If Patent Owner files a revised motion to amend, the Board shall enter a revised scheduling order setting the briefing schedule for that revised motion and adjusting other due dates as needed.”).

Petitioner requests: (1) that the oral argument be held at the San Jose, California, USPTO Regional Office; (2) that Petitioner 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 1–2, 5, 11–13, 16–17, and 47–48 are obvious in view of the prior art grounds presented in the Petition.

2. Whether Patent Owner’s Revised Motion to Amend (Paper 20) complies with Section 316(d) and/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, whether the substitute claims enlarge the scope of the original claims, or whether the substitute claims violate the written description or definiteness requirements.

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

Dated: December 12, 2024

Respectfully submitted,

By: /s/ Matias Ferrario
Matias Ferrario
Registration No. 51,082
Lead 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: December 12, 2024

By: /s/ Matias Ferraro
Matias Ferrario
Registration No. 51,082