UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATAK INC. and NXP USA, INC.,
Petitioners

v.

BELL NORTHERN RESEARCH, LLC,
Patent Owner

Case No. IPR2023-01414
U.S. Patent No. 8,416,862 B2

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Mail Stop Patent Board
Patent Trial and Appeal Board
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. 42.70(a), Petitioner, NXP, U.S.A., Inc. requests oral argument on the issues set forth below at a place and time set by the Board. Oral argument is presently scheduled for January 15, 2025 (Paper No. 12, "Scheduling Order").

Issues to be Presented by Petitioner at Oral Argument:

1. Proper construction of the relevant claims of the '862 patent;
2. The '862 patent is eligible for IPR;
3. Arguments and evidence that claims 1-4 and 9-12 are obvious in view of LI-748, Tong, and Mao;
4. Arguments and evidence that claims 1-4 and 9-12 are obvious over Tong and Mao;
5. Arguments and evidence that claims 1, 3, 4, 9, 11, and 12 are obvious over LI-054 and Mao;
6. Arguments and evidence that claims 2 and 10 are obvious in view of LI-054, Mao, and Yang;
7. Arguments and evidence that claims 1, 3-4, 9 and 11-12 are obvious in view of Poon and Mao;
8. Rebuttal to Patent Owner's arguments and evidence on all matters including the issues listed above;
9. The timeliness of the arguments raised in the proceedings; and

10. 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.

Petitioner requests that the hearing take place via video conference. Petitioner requests the ability to present demonstratives and exhibits to the Board and the ability to have additional counsel, including in-house counsel, attend the video conference from separate locations.

Dated: November 20, 2024

Respectfully Submitted,

/Brian K. Erickson/

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Attorney for Petitioner NXP USA, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies service of a copy of this document on the Patent Owner's counsel of record pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b) by electronic mail to the following:

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Dated: November 20, 2024

Respectfully Submitted,

/*Brian K. Erickson*/
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