

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MEDIATEK INC. and NXP USA, INC.,

Petitioners,

v.

BELL NORTHERN RESEARCH, LLC,

Patent Owner.

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

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.70, Patent Owner Bell Northern Research, LLC (“BNR”) respectfully requests oral argument on issues related to the instituted grounds and on any issues raised in any pending motions or briefing filed by the parties. The scheduling order (Paper No. 12) sets oral argument for January 15, 2025.

BNR specifies, without intent to waive consideration of any issue not requested, the following non-exclusive list of issues to be argued:

1. Proper construction of the relevant claims of the '862 patent;
2. Arguments and evidence that claims 1-4 and 9-12 have not been shown by Petitioner to be obvious in view of Li '748, Tong, and Mao;
3. Arguments and evidence that claims 1-4 and 9-12 have not been shown by Petitioner to be obvious in view of Tong, and Mao;
4. Arguments and evidence that claims 1, 3, 4, 9, 11, and 12 have not been shown by Petitioner to be obvious in view of Li '054 and Mao;
5. Arguments and evidence that claims 2 and 10 have not been shown by Petitioner to be obvious in view of Li '054, Mao, and Yang;
6. Arguments and evidence that claims 1, 3, 4, 9, 11, and 12 have not been shown by Petitioner to be obvious in view of Poon and Mao;
7. Rebuttal to Petitioner's arguments and evidence on all matters including the issues listed above;

8. The timeliness of the arguments and evidence presented in the proceeding; and
9. 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.

BNR reserves the right to supplement and/or amend this statement of issues to the extent permitted by the Board and/or any applicable rules.

BNR respectfully proposes that Patent Owner and Petitioner each be provided 60 minutes of argument time, inclusive of any rebuttal time either party wishes to reserve at the hearing.

BNR requests that the hearing take place via video conference. BNR requests the ability to display demonstratives and exhibits during the hearing.

Patent Owner's Request for Oral Argument
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Dated: November 20, 2024

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on November 20, 2024, the foregoing document was served via electronic mail upon the following counsel of record for Petitioner:

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