

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.,
Petitioner,

v.

HEADWATER RESEARCH LLC,
Patent Owner.

Case IPR2024-00010
Patent 9,615,192

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 8), Petitioner submits this Request for Oral Argument on the instituted unpatentability grounds regarding U.S. Patent No. 9,615,192. Petitioner requests one hour per party of oral argument time. At the oral argument, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether claims 1, 5-7, 9, 11-13, and 15 are unpatentable over TS-23.140, pursuant to 35 U.S.C. §103;
2. Whether claims 2-3 are unpatentable over TS-23.140 and Shen, pursuant to 35 U.S.C. §103;
3. Whether claim 4 is unpatentable over TS-23.140 and Ellison, pursuant to 35 U.S.C. §103;
4. Whether claim 8 is unpatentable over TS-23.140 and Rakic, pursuant to 35 U.S.C. §103;
5. Whether claims 1, 5-7, 9, 11-13, and 15 are unpatentable over Houghton and Munson, pursuant to 35 U.S.C. §103;
6. Whether claims 2-3 are unpatentable over Houghton, Munson, and Shen, pursuant to 35 U.S.C. §103;

7. Whether claim 4 is unpatentable over Houghton, Munson, and Ellison, pursuant to 35 U.S.C. §103;
8. Whether claim 8 is unpatentable over Houghton, Munson, and Rakic, pursuant to 35 U.S.C. §103;
9. Any claim construction issues;
10. Any procedural and/or evidentiary issues;
11. Rebuttal to Patent Owner's presentation on all matters; and
12. Any additional issues on which the Board seeks clarification.

Petitioner requests a virtual hearing. If the hearing is held in person, Petitioner requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen that connects to a laptop computer.

Dated January 8, 2025

/Karan Jhurani/

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(1) and 42.6(e)(4)(iii), the undersigned certifies that on January 8, 2025, a complete and entire copy of this Petitioner's Request for Oral Argument was provided by email to the Patent Owner by serving the email correspondence addresses of record as follows:

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