UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CIRRUS LOGIC, INCORPORATED,
OMNIVISION TECHNOLOGIES, INCORPORATED, and
TEXAS INSTRUMENTS INCORPORATED,
Petitioners,

v.

GREENTHREAD, LLC,
Patent Owner.

IPR2024-00018[1]
U.S. Patent No. 9,190,502

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

[1] Texas Instruments Incorporated, which filed a petition in IPR2024-00773, has been joined as a party to this proceeding.

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper 31), Patent Owner Greenthread, LLC ("Patent Owner") respectfully requests oral argument on issues related to the patentability of the challenged claims of U.S. Patent No. 9,190,502 on the instituted grounds set forth in the Board's Institution Decision (Paper 30), and on any issues specified in any motions to exclude, or any other pending motions or briefing filed.

Requests for oral argument in related IPR proceedings IPR2024-00017 and IPR2024-00021 are being filed concurrently with this request. Patent Owner has conferred with Petitioners Cirrus Logic, Incorporated and OmniVision Technologies, Incorporated ("Petitioners"; collectively with Patent Owner, the "Parties") regarding a consolidated hearing covering the present proceeding and the two proceedings listed above. Patent Owner respectfully requests, and Petitioners indicated they do not oppose, a consolidated hearing in which each side would have 90 minutes to present arguments for all three proceedings (IPR2024-00017, IPR2024-00018 and IPR2024-00021) (i.e., 90 minutes for Petitioners and 90 minutes for Patent Owner). In light of the common specification and drawings for the four patents in these proceedings, and the overlapping prior art issues in these proceedings, Patent Owner believes that such a consolidated format will promote efficiency and clarity for the Parties and the Board. In this format, the Parties would

allocate their allotted time (90 minutes each) across the proceedings as they deem appropriate.

Patent Owner further respectfully requests that the consolidated hearing, scheduled for January 31, 2025, be conducted in person at USPTO Headquarters in Alexandria, Virginia. Upon conferring, Petitioners did not agree with Patent Owner regarding an in-person hearing.

If oral argument will be held in person in a hearing room, Patent Owner respectfully requests permission to use a computer, projector, and screen to display demonstratives, papers, and exhibits. Patent Owner also respectfully requests that its attorneys at counsel's table be allowed to use computers.

Patent Owner expects up to five people to attend for Patent Owner, if the argument is conducted in person and the Board can accommodate this number of attendees for Patent Owner.

Dated: December 20, 2024

Respectfully submitted,

/Alan Whitehurst/

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Counsel for Patent Owner

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of this **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** has been served on Petitioners electronically via email on the following counsel of record for Petitioners:

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Dated: December 20, 2024

By: */Alan Whitehurst/*
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