

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INERGY TECHNOLOGY, INC.,
Petitioner

v.

FORCE MOS TECHNOLOGY CO. LTD.,
Patent Owner

Inter Partes Review No. IPR2024-00094
U.S. Patent No. 7,812,409

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
US Patent and Trademark Office
PO Box 1450
Alexandria, Virginia 22313-1450

Patent Owner hereby requests an oral hearing pursuant to 37 C.F.R. § 42.70.

The Board has scheduled the oral hearing for February 21, 2025.

Without intending to waive any issue not specifically identified, Patent Owner wishes to present arguments on the following issues:

- The proper construction of “substantially square-shaped cells with rounded corners” (cl. 1) and “substantially square-shaped cells with truncated corners” (cl. 6);
- The patentability of claims 1 and 3-5 pursuant to pre-AIA 35 U.S.C. § 102 over Kobayashi;
- The patentability of claims 2 and 6 pursuant to pre-AIA 35 U.S.C. § 103 over Kobayashi in view of Kikkawa;
- The patentability of claim 5 pursuant to pre-AIA 35 U.S.C. § 103 over Kobayashi in view of the knowledge of a POSITA;
- The patentability of claims 1 and 3-5 pursuant to pre-AIA 35 U.S.C. § 103 over Kobayashi in view of Hshieh;
- The patentability of claims 2 and 6 pursuant to pre-AIA 35 U.S.C. § 103 over Kobayashi in view of Kikkawa and Hshieh;
- The patentability of claim 5 pursuant to pre-AIA 35 U.S.C. § 103 over Kobayashi in view of Kikkawa, Hshieh, and the knowledge of a POSITA;

- Any issues specified by Petitioner in its Request for Oral Argument;
- Any issues addressed in Patent Owner's papers, including but not limited to, the Patent Owner's Response and Patent Owner's Sur-Reply;
- Any motions to exclude evidence filed by any party;
- Any other motions or issues that remain pending at the time of the hearing;
- Any other issues the Board deems necessary for issuing a final written decision.

Patent Owner believes the parties need no more than sixty minutes per side to present arguments in this case.¹ Patent Owner also proposes that oral arguments be conducted by video conference. Thus, Patent Owner respectfully requests that the Board provide a video conferencing platform and a public telephone line. However, to the extent the oral argument will be conducted in-person at the offices of the

¹ The Board entered a consolidated scheduling order in this IPR, along with IPR2024-00093 (Patent 7,629,634 ("634 Patent")). Paper No. 10. Because the '409 and '634 Patents are from different patent families, and because the two IPRs involve significantly different issues, Patent Owner requests that argument in this IPR be separate from (and not share time with) argument in IPR2024-00093.

United States Patent and Trademark Office, Patent Owner respectfully requests permission to use audio/visual equipment to display demonstrative exhibits.

Dated: January 6, 2025

Respectfully submitted,

/Michael D. Saunders/

Michael D. Saunders, Reg. No. 77,739

msaunders@dickinsonwright.com

Bryan D. Atkinson, Reg. No. 52,574

batkison@dickinsonwright.com

DICKINSON WRIGHT PLLC

607 W. 3rd Street, Suite 2500

Austin, Texas 78701

Telephone: (512) 770-4200

Facsimile: (844) 670-6009

Attorneys for Patent Owner

Certificate of Service 37 C.F.R. § 42.6(e)

The undersigned certifies that on January 6, 2025, I will cause true and correct copies of the foregoing Patent Owner's Request for Oral Argument to be served electronically upon the following attorneys who have consented to service via email. Paper No. 16.

Charles M. McMahon
Registration No. 44,926
BENESCH FRIEDLANDER
COPLAN & ARANOFF LLP
71 South Wacker Dr., Suite 1600
Chicago, IL 60606
Tel: (312) 212-4949
cmcMahon@beneschlaw.com

Mircea Tipescu
Registration No. 53,690
BENESCH FRIEDLANDER
COPLAN & ARANOFF LLP
71 South Wacker Dr., Suite 1600
Chicago, IL 60606
Tel: (312) 212-4949
mtipescu@beneschlaw.com

Ziyong "Sean" Li
Registration No. 76,089
BENESCH FRIEDLANDER
COPLAN & ARANOFF LLP
100 Pine Street, Suite 3100
San Francisco, CA 78701
Tel: (628) 600-2250
sli@beneschlaw.com

Respectfully submitted,

/Michael D. Saunders/
Michael D. Saunders, Reg. No. 77,739
msaunders@dickinsonwright.com
DICKINSON WRIGHT PLLC
607 W. 3rd Street, Suite 2500
Austin, Texas 78701
Telephone: (512) 770-4200
Facsimile: (844) 670-6009
Attorney for Patent Owner