UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SEMICONDUCTOR COMPONENTS INDUSTRIES, LLC

Petitioner,

v.

GREENTHREAD, LLC,

Patent Owner

IPR2024-00264
Patent 10,734,481

PETITIONER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Semiconductor Components Industries, LLC ("Petitioner") hereby submits this request for an oral argument in the present *inter partes* review. Per the Board's Scheduling Order, the oral argument is currently scheduled for May 6, 2025. Scheduling Order, Paper 22, p. 12.

Patent Owner and Petitioner have conferred. Petitioner understands that Patent Owner intends to request that a consolidated hearing for IPR2024-00263, -00264, -00265, and -00266 be held in-person, with 90 minutes of oral argument per side and the parties free to allocate those 90 minutes as desired among the four IPRs.

Petitioner does not believe that a hearing is necessary for IPR2024-00263, -00264, -00265, and -00266 because the issues overlap significantly with those of IPR2023-01242, -01243, and -01244, which involved related patents and for which the Board already issued Final Written Decisions. However, to the extent the Board believes that a hearing would be helpful, Petitioner respectfully requests a consolidated hearing for IPR2024-00263, -00264, -00265, and -00266, with 60 minutes of oral argument per side and the opportunity to address all issues raised in the papers of the four IPRs, with the parties free to allocate those 60 minutes as desired among the four IPRs. The parties previously agreed that 60 minutes was sufficient to resolve the same set of issues in IPR2023-01242, -01243, and -01244,

and Petitioner thus submits that the same time limit should apply in IPR2024-00263, -00264, -00265, and -00266. Petitioner is neutral regarding whether the hearing is held in-person or remotely, and defers to the preferences and logistics of the Board on this point.

In total, the issues include:

IPR2024-00263 (U.S. Patent 11,316,014)

- How claims 1–9, 13-14, and 16–28 are obvious over Kawagoe;
- How claims 1-2, 4-9, 13-23, and 25-28 are obvious over Wieczorek and Wolf;
- How claims 1-9, 13-14, and 16-28 are obvious over Kawagoe and Gupta;
- How claims 1-2, 4-9, 13-23, and 25-28 are obvious over Wieczorek, Wolf, and Gupta;
- How claim 19 is obvious over Kawagoe and Silverbrook;
- How claim 19 is obvious over Wieczorek, Wolf, and Silverbrook;
- Any other issues raised in any paper filed by the parties; and
- Any responses to issues raised by the Board or Patent Owner at the oral argument.

IPR2024-00264 (U.S. Patent 10,734,481)

- How claims 1-9, 13-14, 16-27, and 31-36 are obvious over Kawagoe;
- How claims 1-2, 4-9, 13-22, 24-27, and 31-36 are obvious over Wieczorek

and Wolf;

- How claims 1-9, 13-14, 16-27, and 31-36 are obvious over Kawagoe and Gupta;
- How claims 1-2, 4-9, 13-22, 24-27, and 31-36 are obvious over Wieczorek, Wolf, and Gupta;
- How claims 19 and 36 are obvious over Kawagoe and Silverbrook;
- How claims 19 and 36 are obvious over Wieczorek, Wolf, and Silverbrook;
- Any other issues raised in any paper filed by the parties; and
- Any responses to issues raised by the Board or Patent Owner at the oral argument.

IPR2024-00265 (U.S. Patent 9,190,502)

- How claims 7 and 12 are obvious over Payne;
- How claims 7-12 are obvious over Sakai and Kawagoe;
- How claims 9-11 are obvious over Payne and Wolf;
- How claim 8 is obvious over Payne and Parrillo;
- How claim 12 is obvious over Payne and Silverbrook;
- How claims 7-12 are obvious over Sakai, Kawagoe, and Silverbrook;
- Any other issues raised in any paper filed by the parties; and
- Any responses to issues raised by the Board or Patent Owner at the oral

argument.

IPR2024-00266 (U.S. Patent 8,421,195)

- How claims 1-2 and 4-6 are obvious over Payne;
- How claims 1-6 are obvious over Sakai and Kawagoe;
- How claims 2 and 3 are obvious over Payne and Wolf;
- How claim 3 is obvious over Payne and Parillo;
- How claim 2 is obvious over Sakai, Kawagoe, and Wolf;
- Any other issues raised in any paper filed by the parties; and
- Any responses to issues raised by the Board or Patent Owner at the oral argument.

If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference.

Dated: March 25, 2025

/Roger Fulghum/
Roger Fulghum
Reg. No. 39,678

Counsel for Petitioner
Semiconductor Components Industries, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 25th day of March, 2025, **PETITIONERS' REQUEST FOR ORAL ARGUMENT** was served by email on the following counsel for Patent Owner and the Joined Petitioner:

Greenthread-OnSemi-MS@mckoolsmith.com

awhitehurst@mckoolsmith.com

ajairam@mckoolsmith.com

nozarkar@mckoolsmith.com

Dated: March 25, 2025

/Roger Fulghum/
Roger Fulghum
Reg. No. 39,678

Counsel for Petitioner
Semiconductor Components
Industries, LLC