UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., and VIZIO, INC.
Petitioner,[1]

v.

MULTIMEDIA TECHNOLOGIES PTE. LTD.,
Patent Owner.

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Case IPR2024-00352
U.S. Patent No. 9,247,174

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PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

[1] VIZIO, Inc. filed a petition in IPR2024-00696 and was joined as petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.70 and the Board's May 21, 2024, Scheduling Order (Paper 10), Multimedia Technologies Pte. Ltd. ("Patent Owner") respectfully requests oral argument, currently scheduled for February 19, 2025. Patent Owner requests a remote hearing, although Patent Owner can conduct an in-person hearing if that is more convenient for the Board.

Reservation Of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund., Ltd. et al. v. VirnetX Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.")

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, anticipation, obviousness, motivation to combine, and reasonable expectation of success;
- The timeliness of the arguments raised in the proceedings;

- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and
- 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.

The Board's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 60 minutes of total argument time per side. Patent Owner believes that this is a sufficient amount of time to discuss all issues in this case.

Equipment: Patent Owner requests teleconference software (e.g., Zoom, Teams, etc.) with the ability to display possible demonstratives and exhibits during the remote hearing.

Respectfully submitted,

/Stephen T. Schreiner/
Stephen T. Schreiner, Reg. No. 43,097
CARMICHAEL IP, PLLC

Date: January 6, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

The names and address of the parties being served are as follows:

LG Electronics:	**Vizio:**
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Respectfully submitted,

/Stephen T. Schreiner/

Date: January 6, 2025