

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMCAST CABLE COMMUNICATIONS, LLC,
Petitioner,

v.

ENTROPIC COMMUNICATIONS, LLC,
Patent Owner.

Case IPR2024-00435
Patent 11,381,866

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order (Paper 27), Entropic Communications, LLC (“Patent Owner”) respectfully requests oral argument, as currently scheduled for July 18, 2025.

Request For In-Person Hearing: Patent Owner respectfully requests an in-person hearing at a location that is most convenient for the Board.

Consolidated Oral Argument: IPR2024-00435 is one of three proceedings challenging related patents (IPR2024-0432 (’362 Patent), -00435 (’866 Patent), and -0438 (’206 Patent)). The three proceedings have overlapping grounds and arguments. *See, e.g.*, IPR2024-00432 Paper 2 (Pet.), 18; IPR2024-00435 Paper 2 (Pet.), 11-12; IPR2024-00438 Paper 2 (Pet.), 12-13. To improve efficiency, Patent Owner respectfully requests a consolidated oral argument for the three related proceedings.

Time Allotment: Patent Owner respectfully requests that the Board authorize 120 minutes of total argument time per side. The Board has routinely allowed up to 120 minutes of argument per side where multiple patents are argued. *Mianyang BOE Optoelects. Tech. Co., Ltd. v. Samsung Display Co., Ltd.*, IPR2023-01075, Paper 36, 2 (Aug. 27, 2024) (3 IPRs, 3 patents, same parties, 120 minutes of total argument time per side); *LifeCORE Fitness, LLC v. Woodway USA, Inc.*, IPR2023-00834, Paper 37, 2-3 (June 24, 2024) (3 IPRs, 3 patents, same parties, 120 minutes of total argument time per side); *Magic Leap, Inc. v. Percept Techs*

Inc., IPR2023-00494, Paper 17, 2-3 (Apr. 3, 2024) (2 IPRs, 2 patents, same parties, 120 minutes of total argument time per side); *Intuit, Inc. v. Samesurf, Inc.*, IPR2023-00342, Paper 39, 2 (Feb. 23, 2024) (3 IPRs, 3 patents, same parties, 120 minutes of total argument time per side).

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 (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, level of ordinary skill in the art, anticipation, obviousness, analogous art, motivation to combine, and reasonable expectation of success;
- The timeliness of the arguments raised in the proceedings;
- Responses to any arguments made by Petitioner;
- 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.

Equipment: Patent Owner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits.

Respectfully submitted,

/ Parham Hendifar/
Parham Hendifar, Reg. No. 71,470
LOWENSTEIN & WEATHERWAX LLP

Date: May 27, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service on the date signed below:

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

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

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Respectfully submitted,

/ Kenneth Wang /

Date: May 27, 2025