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 IPR2024-00438
Patent 11,399,206

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Comcast Cable Communications, LLC ("Petitioner") hereby requests oral argument under 37 C.F.R. § 42.70 and the Board's October 9, 2024 Scheduling Order (Paper 15). Petitioner further requests that the Board consolidate the oral arguments for IPR2024-00432, IPR2024-00435, and IPR2024-00438 into a single hearing. Pursuant to the Board's Order Modifying Date of Oral Argument, oral argument is currently scheduled for July 18, 2025 in all three IPRs (Paper 27).

Petitioner requests argument on all grounds accepted for trial in the Institution Decision and any questions that the Board may have, including:

A. Whether claims 1, 3-7, 9, 11, 13, 15-19, 21, 23, 25, 27-31, 33-35, 38, 40-44, and 46-48 are unpatentable under 35 U.S.C. § 102 over Zhang;

B. Whether claims 1, 3-7, 9, 11, 13, 15-19, 21, 23, 25, 27-31, 33-35, 38, 40-44, and 46-48 are unpatentable under 35 U.S.C. § 103 over Zhang;

C. Whether claims 9-12, 21-25, 27-31, 33-38, 40-44, 46-51, 53-57, 59-64, 66-70, and 72-76 are unpatentable under 35 U.S.C. § 103 over Zhang in view of Reisman;

D. Whether claims 2-6, 14-18, 26-30, and 39-43 are unpatentable under 35 U.S.C. § 103 over Zhang in view of Jackson;

E. Whether claims 26-30, 39-43, 52-56, and 65-69 are unpatentable under 35 U.S.C. § 103 over Zhang in view of Reisman and Jackson;

F. Whether claims 1, 3-9, 11, 13, 15-21, 23, 32-34, and 45-47 are unpatentable under 35 U.S.C. § 103 over Zhang in view of Pandey;

G. Whether claims 9-12, 21-24, 32-34, 45-47, 58-60, and 71-73 are unpatentable under 35 U.S.C. § 103 over Zhang in view of Reisman and Pandey; and

H. Whether claims 2-6 and 14-18 are unpatentable under 35 U.S.C. § 103 over Zhang in view of Pandey and Jackson.

Furthermore, Petitioner requests argument on any additional issues that Patent Owner may seek to raise on oral argument including rebuttal to any material in Patent Owner's presentation, any additional issues raised in papers filed in this proceeding to include Patent Owner's Response or Sur-Reply, any additional issues raised in papers which are yet to be filed such as Motions to Exclude and Oppositions to Motions to Exclude, and any other filings, motions, pleadings, or issues deemed necessary by the Board for issuing a Final Written Decision.

Given the number of combinations of prior art and the number of challenged claims, Petitioner suggests that an allocation of up to 120 minutes per side would be appropriate for a consolidated hearing, or 60 minutes per side for separate hearings in each IPR.

Finally, Petitioner's counsel and Patent Owner's counsel conferred about whether the hearing should be conducted in-person or via video conference.

Petitioner prefers, and hereby requests, that the hearing be conducted in-person at the Denver, Colorado, USPTO Regional Office. Counsel for Patent Owner indicated that Patent Owner would be requesting the same.

Dated: May 27, 2025

By: /Frederic M. Meeker/

Frederic M. Meeker
Reg. No. 35,282
Banner & Witcoff, Ltd.
1100 13th Street, NW
Suite 1200
Washington, DC 20005
(202) 824-3000
fmeeker@bannerwitcoff.com

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.105, I hereby certify that I caused a true and correct copy of this **PETITIONER'S REQUEST FOR ORAL ARGUMENT** in connection with IPR2024-00435 to be served via e-mail on May 27, 2025, in its entirety on the following counsel of record for Patent Owner:

JASON.ENGEL.PTAB@KLGATES.COM
WEATHERWAX@LOWENSTEINWEATHERWAX.COM
ENTROPIC_IPRS@LOWENSTEINWEATHERWAX.COM
ERIK.HALVERSON@KLGATES.COM
KYLE.KANTAREK@KLGATES.COM
NOLAN.HUBBARD@KLGATES.COM
MATTHEW.BLAIR@KLGATES.COM

Dated: May 27, 2025 By: /Carlos Goldie/

Carlos Goldie