

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 IPR2024-00446
Patent 8,223,775

**PATENT OWNER ENTROPIC COMMUNICATIONS, LLC'S
REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order (Paper 12), Entropic Communications, LLC (“Patent Owner”) respectfully requests oral argument, as currently scheduled for June 2, 2025.

Time Allotment: In view of the multiple issues raised, Patent Owner respectfully requests 1 hour (60 minutes) per side for argument. Patent Owner notes that Petitioner suggested the same time allotment in its request.

Request For In-Person Hearing: Patent Owner respectfully requests an in-person hearing. The Scheduling Order states that the parties may request a hearing in Denver or Alexandria. Patent Owner respectfully requests a hearing in Denver, Colorado due to shorter travel times. Patent Owner’s lead counsel is located in Chicago and will be in Dallas for in-person IPR hearings on June 4 (IPR2024-00430 and IPR2024-00431) and June 6 (IPR2024-00441). The remainder of Patent Owner’s counsel at Lowenstein & Weatherwax LLP are located in Santa Monica, California, and at least two attorneys from that firm are expected to attend the hearing. Petitioner’s lead counsel in the present matter is also lead counsel in the other three matters and, thus, will presumably be in Dallas during the week of June 2. Consequently, Denver, which is closer to Dallas, appears to be a more convenient location, all things considered, for both parties, their attorneys, and potentially the Board. Petitioner requested that the hearing occur in Alexandria, Virginia.

Additionally, as just noted, the parties have in-person hearings in IPR2024-00430, IPR2024-00431, and IPR2024-00441 scheduled in Dallas on June 4 and 6. The panels on those cases have two judges in common with the present panel, and both Petitioner and Patent Owner have the same lead counsel in all four cases. While Dallas is not an option in the Scheduling Order, Patent Owner would be amenable to a hearing in Dallas if 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 (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: Should the Board order an in-person hearing, Patent Owner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits.

Respectfully submitted,

/ Kenneth J. Weatherwax /
Kenneth J. Weatherwax (Reg. No. 54,528)
Nathan Lowenstein, *pro hac vice*
Colette Woo, *pro hac vice*
LOWENSTEIN & WEATHERWAX LLP

Date: April 22, 2025

CERTIFICATE OF SERVICE

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

PATENT OWNER ENTROPIC COMMUNICATIONS, LLC'S REQUEST FOR ORAL ARGUMENT

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

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Respectfully submitted,

/ Keith Moore /

Date: April 22, 2025