

Patent Owner's Request for Oral Argument

IPR2024-00533

IPR2024-00534

IPR2024-00535

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR, LLC,
Petitioners

v.

CHIEN-MIN SUNG,
Patent Owner

IPR2024-00533 (U.S. Patent No. 8,974,270)

IPR2024-00534 (U.S. Patent No. 9,138,862)

IPR2024-00535 (U.S. Patent No. 9,724,802)

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via P-TACTS

Pursuant to 37 C.F.R. § 42.70, Patent Owner Chien-Min Sung ("Patent Owner") respectfully requests oral argument on issues related to the instituted grounds and on any issues raised in any pending motions or briefing filed by the parties. The scheduling order sets oral argument for June 19, 2025.

Patent Owner requests (without any intent to waive considerations of any issue not requested) to address the following issues at the oral hearing:

- All purported grounds of unpatentability of U.S. Patent No. 8,974,270 (the "'270 patent") asserted by Petitioners Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC ("Petitioners");
- All purported grounds of unpatentability of U.S. Patent No. 9,138,862 (the "'862 patent") asserted by Petitioners;
- All purported grounds of unpatentability of U.S. Patent No. 9,724,802 (the "'802 patent") asserted by Petitioners;
- The priority date of the '802 patent;
- The proper definition of a person of ordinary skill in the art for the '270 patent, whether Petitioners' expert Dr. Stanley Shanfield meets that definition;
- The proper definition of a person of ordinary skill in the art for the '862 patent, whether Petitioners' expert Dr. Stanley Shanfield meets that definition;

- The proper definition of a person of ordinary skill in the art for the '802 patent, whether Petitioners' expert Dr. Stanley Shanfield meets that definition;
- Whether Dr. Stanley Shanfield is qualified to provide expert testimony under F.R.E. 702;
- Whether any claim terms of the '270 patent, '862 patent, or '802 patent require construction;
- Any subsidiary issues relevant to the issues above;
- Any other issues raised in papers filed in this proceeding, including in papers that have not yet been filed;
- Any issues specified by Petitioner in its request for oral argument or raised by Petitioner during oral argument; and
- Any other issues the Board deems necessary for issuing a final written decision.

Patent Owner respectfully requests that the Board schedule a video hearing for this proceeding.

Patent Owner will provide Petitioners and the Board with an electronic binder containing the demonstrative exhibits. Patent Owner requests that the Board grant each side two hours of oral argument in a consolidated hearing encompassing IPR2024-00533, -00534 and -00535. Patent Owner requests the ability to reserve a

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IPR2024-00533

IPR2024-00534

IPR2024-00535

portion of its total time for presenting sur-rebuttal arguments after Petitioners' rebuttal arguments.

This Request is timely being filed on May 7, 2025. (*See Scheduling Order at 12.*)

Respectfully submitted,

Dated: May 7, 2025

/s/Alex Chan

Alex Chan (Reg. No. 52,713)

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Counsel for Patent Owner

Chien-Min Sung

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on May 7, 2025, the foregoing document and accompanying exhibits are being served via electronic mail upon the following counsel of record for Petitioners:

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/s/Alex Chan

Alex Chan