

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NINTENDO CO., LTD., and
NINTENDO OF AMERICA INC.,
Petitioners,

v.

AMERICAN GNC CORPORATION,
Patent Owner

IPR2024-00668
U.S. Patent No. 6,671,648

AMERICAN GNC'S REQUEST FOR ORAL ARGUMENT

Patent Owner American GNC Corporation (“American GNC”) respectfully requests oral argument in Case IPR2024-00668, in which oral argument is currently scheduled for May 28, 2025.

American GNC plans to present oral argument on the following issues:

1. Claim 1 would not have been obvious over Smith (Ex. 1003) in view of Chan (Ex. 1005), and Bernstein (Ex. 1006);
2. Claims 1 and 4 would not have been obvious over Smith (Ex. 1003) in view of Chan (Ex. 1005), Bernstein (Ex. 1006), Irwin (Ex.1007), and Merhav (Ex. 1008);
3. Claim 1 would not have been obvious over Tingleff (Ex. 1004) in view of Chan (Ex. 1005), and Bernstein (Ex. 1006);
4. Claims 1 and 4 would not have been obvious over Yamawaki (Ex. 1009) in view of Chan (Ex. 1005), Bernstein (Ex. 1006), and Saubolle (Ex. 1011);
5. Any claim construction issues associated with the foregoing, including the proper interpretation of “micro inertial measurement unit,” angular rate electrical signals,” and “angular rate voltage signals”;
6. Any motion to strike or exclude evidence that either party files; and
7. This proceeding should be dismissed because the petition failed to identify real parties in interest STMicroelectronics, N.V. and STMicroelectronics, S.R.L.

American GNC also anticipates that it will present oral argument to rebut Petitioner Nintendo's arguments.

American GNC respectfully requests 40 minutes to present its arguments in this proceeding.

If the hearing is to take place in person, American GNC also respectfully requests the use of audiovisual equipment to display demonstratives, exhibits, and papers, including the use of a computer, ELMO document presenter, projector, and screen.

Dated: April 22, 2025

/s/ Corey Johanningmeier
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Counsel for Patent Owner

CERTIFICATE OF SERVICE

Petitioner has consented to e-mail service in this proceeding. Pursuant to 37 C.F.R. §42.6, the undersigned certifies that on April 22, 2025, a copy of the foregoing document was served by email upon the following counsel at the below email addresses:

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Patrick W. Lauppe (Admission *pro hac vice* to be requested)
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