

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.

Petitioners,

v.

MAXELL, LTD.,
Patent Owner

Case: IPR2024-00717

U.S. Patent No. 11,223,757

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

Patent No. 11,223,757

Patent Owner's Request for Oral Argument

Pursuant to 37 C.F.R. 42.70(a), Patent Owner Maxell, Ltd. requests oral argument on the issues set forth below at the place and time set by the Board. Oral Argument is currently scheduled for August 14, 2025. (Paper 10).

Issues to be presented by Patent Owner at Oral Argument:

1. Proper construction of the relevant claims of the '757 Patent;
2. Arguments and evidence that Claims 1-8 and 10-11 are patentable in view of Chinn, Takahashi, and EX-V7;
3. Arguments and evidence that Claim 9 is patentable over Chinn, Takhashi, EX-V7, and Kim;
4. Arguments and evidence that Claims 1-3, and 7-10 are patentable over Kim, Yamamoto, and Thorn;
5. Arguments and evidence that Claims 4-6 are patentable over Kim, Yamamoto, Thorn, and Chinn;
6. Arguments and evidence that Petitioners have failed to allege the references are analogous art;
7. Rebuttal to Petitioner's arguments and evidence on all matters including the issues listed above;
8. 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.

Patent Owner requests and would prefer that the oral hearing take place at USPTO headquarters in Alexandria, VA. Patent Owner requests the ability to present demonstratives and exhibits to the Board.

Dated: June 26, 2025

Respectfully submitted,

/Robert G. Pluta /

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Counsel for Maxell, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June, 2025, a copy of the attached
PATENT OWNER'S ORAL ARGUMENT REQUEST, together with all exhibits
was served by electronic mail to the attorneys of record, at the following addresses:

James Heintz
Jim.Heintz@us.dlapiper.com

Gianni Minutoli
Gianni.Minutoli@us.dlapiper.com

With a courtesy copy by electronic mail to:

dla-samsung-maxell@us.dlapiper.com

Respectfully submitted,

Date: June 26, 2025

By:

/Robert G Pluta Reg No 50970/

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