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

Inter Partes Review No.: IPR2024-00777

U.S. Patent No. 11,017,815

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. 42.70(a), Petitioners, Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., request oral argument on the issues set forth below at a place and time set by the Board. Oral argument is presently scheduled for September 9, 2025 (Paper No. 13, "Scheduling Order").

Issues to be Presented by Petitioners at Oral Argument:

1. Proper construction of the relevant claims of the '815 patent;
2. The '815 patent is eligible for IPR;
3. Arguments and evidence that claims 16-19 and 21-25 are obvious in view of Horn, Baumgartner, and Candelore;
4. Arguments and evidence that claims 20, 26, and 27 are obvious over Horn, Baumgartner, Candelore, and WinTV;
5. Arguments and evidence that claims 16-27 are obvious in view of Horn, Baumgartner, Candelore, WinTV, and Chao;
6. Arguments and evidence that claims 16-19 and 21-25 are obvious in view of Kaplan, Bryant, Wong, and Candelore.
7. Arguments and evidence that claims 20, 26, and 27 are obvious in view of Kaplan, Bryant, Wong, Candelore, and WinTV.
8. Rebuttal to Patent Owner's arguments and evidence on all matters including the issues listed above;
9. The timeliness of the arguments raised in the proceedings; and

10. 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.

Petitioners request that the oral hearing take place at USPTO headquarters in Alexandria, VA. Petitioners request the ability to present demonstratives and exhibits to the Board and the ability to have additional counsel, including in-house counsel, attend the video conference from separate locations.

Date: June 25, 2025

Respectfully submitted,

/s/ James Heintz

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Attorney for Petitioners

CERTIFICATE OF SERVICE

The undersigned certifies that on June 25, 2025, a true and correct copy of the Petitioners' Request for Oral Argument was served by emailing a copy of same (by agreement) to the following attorneys for the Patent Owner:

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Date: June 25, 2025

Respectfully submitted,

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