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: IPR2024-00777

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

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

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 September 9, 2025. (Paper 12).

Issues to be presented by Patent Owner at Oral Argument:

1. Proper construction of the relevant claims of the '815 Patent;
2. Arguments and evidence that there is no motivation to combine Horn and Baumgartner;
3. Arguments and evidence that Claims 16-19 and 21-25 are patentable in view of Horn, Baumgartner, and Candelore;
4. Arguments and evidence that Petitioner has not provided sufficient evidence that WinTV was publicly accessible;
5. Arguments and evidence that there is no motivation to combine WinTV with Horn and Baumgartner;
6. Arguments and evidence that Claims 20, 26, and 27 are patentable over Horn, Baumgartner, Candelore, and WinTV;
7. Arguments and evidence that Claims 16-27 are patentable over Horn, Baumgartner, Candelore, WinTV, and Chao;
8. Arguments and evidence that Wong is not prior art;
9. Arguments and evidence that there is no motivation to combine Kaplan, Bryant, Wong, and Candelore;

10. Arguments and evidence that Claims 16-19 and 21-25 are patentable over Kaplan, Bryant, Wong, and Candelore;
11. Arguments and evidence that Claims 20, 26, and 27 are patentable over Kaplan, Bryant, Wong, Candelore, and WinTV;
12. Arguments and evidence that collateral estoppel does not apply to the Kaplan and Bryant grounds;
13. Rebuttal to Petitioner's arguments and evidence on all matters including the issues listed above;
14. 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 /

Robert G. Pluta (Reg. No. 50,970)
MAYER BROWN LLP
71 S. Wacker Drive
Chicago, IL 60606
Telephone: (312) 701-8641

Fax: (312) 706-8144
rpluta@mayerbrown.com

Saqib J. Siddiqui (Reg. No. 68,626)
MAYER BROWN LLP
1999 K Street NW
Washington, D.C., 20006
ssiddiqui@mayerbrown.com

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/

Robert G. Pluta (Reg. No. 50,970)

Counsel for Maxell, Ltd.