

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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

v.

**MAXELL, LTD.,**  
Patent Owner

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Inter Partes Review No.: IPR2024-00867

U.S. Patent No. 10,176,848

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**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 August 14, 2025 (Paper No. 10, “Scheduling Order”).

Issues to be Presented by Petitioners at Oral Argument:

1. Proper construction of the relevant claims of the '848 patent;
2. The '848 patent is eligible for IPR;
3. Arguments and evidence that claims 11, 12, 16, 17, 19, and 20 are obvious in view of Nozaki and Haitani;
4. Arguments and evidence that claim 84 is obvious over Nozaki, Haitani, and Graham;
5. Arguments and evidence that claim 84 is obvious in view of Nozaki, Haitani, and Kim;
6. Rebuttal to Patent Owner's arguments and evidence on all matters including the issues listed above;
7. The timeliness of the arguments raised in the proceedings; and
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.

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

James Heintz

Reg. No. 41828

**DLA Piper LLP**

One Fountain Square

11911 Freedom Drive, Suite 300

Reston, VA 20190-5602

Phone: + 1 703 773 4000

Fax: + 1 703 773 5000

[jim.heintz@us.dlapiper.com](mailto:jim.heintz@us.dlapiper.com)

Gianni Minutoli

Reg. No. 41198

**DLA Piper LLP**

One Fountain Square

11911 Freedom Drive, Suite 300

Reston, VA 20190-5602

Phone: + 1 703 773 4000

Fax: + 1 703 773 5000

[Gianni.minutoli@us.dlapiper.com](mailto:Gianni.minutoli@us.dlapiper.com)

*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:

[rpluta@mayerbrown.com](mailto:rpluta@mayerbrown.com)

[maxell-samsung-service@mayerbrown.com](mailto:maxell-samsung-service@mayerbrown.com)

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Phone: + 1 703 773 4000

Fax: + 1 703 773 5000

[Gianni.minutoli@us.dlapiper.com](mailto:Gianni.minutoli@us.dlapiper.com)

*Attorney for Petitioners*