

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.: IPR2024-00907

U.S. Patent No. 10,129,590

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 12, 2025 (Paper No. 13, “Scheduling Order”).

Issues to be Presented by Petitioners at Oral Argument:

1. Proper construction of the relevant claims of the '590 patent;
2. The '590 patent is eligible for IPR;
3. Arguments and evidence that claims 1, 4-5, 8-12, and 14-25 are obvious in view of N93, Dua, and Herle;
4. Arguments and evidence that claims 1, 4-5, 8-12, and 14-25 are obvious over N93, Dua, Herle, Rooyen, Desai, BT-Spec, 3GPP-Spec, and Kao;
5. Arguments and evidence that claims 1, 4-5, 8-12, and 14-25 are obvious in view of Dua and Herle;
6. Arguments and evidence that claims 1, 4-5, 8-12, and 14-25 are obvious in view of Dua, Herle, and N93.
7. Arguments and evidence that claims 1, 4-5, 8-12, and 14-25 are obvious in view of Dua, Herle, N93, Rooyen, Desai, BT-Spec, 3GPP-Spec, and Kao.
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: July 30, 2025

Respectfully submitted,

/s/ Gianni Minutoli

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Attorney for Petitioners

CERTIFICATE OF SERVICE

The undersigned certifies that on July 30, 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: July 30, 2025

Respectfully submitted,

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