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: IPR2024-00907

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

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 12, 2025. (Paper 13).

Issues to be presented by Patent Owner at Oral Argument:

1. Patent Owner's opposition to Petitioner's motion to submit supplemental information.
2. Proper construction of the relevant claims of the '590 Patent;
3. Arguments and evidence that Grounds 1, 2, 4, and 5 fail because Petitioner has failed to show that N93, BT-Spec, and 3GPP-Spec are prior art;
4. Arguments and evidence that there is no motivation to combine N93, Dua, and Herle.
5. Arguments and evidence that Claims 1, 4-5, 8-12, and 14-25 are patentable in view of N93, Dua, and Herle;
6. Arguments and evidence that there is no motivation to combine N93, Dua, Herle, van Rooyen, Desai, BT-Spec, 3GPP-Spec, and Kao;
7. Arguments and evidence that Claims 1, 4-5, 8-12, 14-21, and 23-25 are patentable in view of N93, Dua, Herle, van Rooyen, Desai, BT-Spec, 3GPP-Spec, and Kao;
8. Arguments and evidence that Claims 1, 4-5, 8-12, and 14-25 are

patentable in view of N93, Dua, and Herle;

9. Arguments and evidence that Claims 1, 4-5, 8-12, and 14-25 are patentable in view of Dua, Herle, and N93;
10. Arguments and evidence that Claims 1, 4-5, 8-12, and 14-25 are patentable in view of Dua, Herle, N93, van Rooyen, Desai, BT-Spec, 3GPP-Spec, and Kao;
11. Rebuttal to Petitioner's arguments and evidence on all matters including the issues listed above;
12. 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: July 30, 2025

Respectfully submitted,

/*Robert G. Pluta* /

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Counsel for Maxell, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of July, 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
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Gianni Minutoli
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With a courtesy copy by electronic mail to:

dla-samsung-maxell@us.dlapiper.com

Respectfully submitted,

Date: July 30, 2025 By: /Robert G Pluta Reg No 50970/
Robert G. Pluta (Reg. No. 50,970)

Counsel for Maxell, Ltd.