

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ENERGY SOLUTION, LTD.,
SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

MOLECULAR REBAR DESIGN LLC,
Patent Owner.

Case IPR2024-01005¹
Patent 9,636,649 B2

PETITIONER'S REQUEST FOR ORAL ARGUMENT

¹ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., which filed a petition in IPR2025-00355, have been joined as petitioners in this proceeding.

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 10), Petitioner submits this Request for Oral Argument on the instituted unpatentability grounds regarding U.S. Patent No. 9,636,649. Petitioner requests an in-person hearing at the USPTO's Alexandria office, and sixty minutes per party of oral argument time. At the oral argument, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether claims 1-7, 11, 13-14 and 17-19 are unpatentable over Sun, pursuant to 35 U.S.C. §103;
2. Whether claims 1-8, 11-15, 17-19 and 21 are unpatentable over Farrugia and Narayan, pursuant to 35 U.S.C. §103;
3. Whether claims 16 and 20 are unpatentable over Sun, Kaji, and Matsushita, pursuant to 35 U.S.C. §103;
4. Whether claims 22-23 are unpatentable over Farrugia, Narayan, and Nanya, pursuant to 35 U.S.C. §103;
5. Whether claim 8 is unpatentable over Sun and Buretea, pursuant to 35 U.S.C. §103;
6. Whether claims 9-10, 15 and 21-23 are unpatentable over Sun and Kaji, pursuant to 35 U.S.C. §103;

7. Any claim construction issues;
8. Any procedural and/or evidentiary issues;
9. Rebuttal to Patent Owner's presentation on all matters; and
10. Any additional issues on which the Board seeks clarification.

Petitioner requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen that connects to a laptop computer.

Respectfully submitted,

Dated: August 4, 2025

/Hyun Jin In/
W. Karl Renner, Reg. No. 41,265
Timothy Riffe, Reg. No. 43,881
Hyun Jin In, Reg. No. 70,014
Gretchen A. DeVries, Reg. No. 72,505
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4)(i) *et seq.* and 42.105(b), the undersigned certifies that on August 4, 2025, a complete and entire copy of this Petitioner's Request for Oral Argument was provided by electronic mail to the Patent Owner by serving the correspondence e-mail address of record as follows:

Stephen D. Zinda
James H. Hall
James A. Glenn
CABELLO HALL ZINDA, PLLC
801 Travis, Suite 1610
Houston, TX 77002

Email: stephen@chzfirm.com
james@chzfirm.com
jglenn@chzfirm.com
paralegal@chzfirm.com

/Diana Bradley/
Diana Bradley
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
bradley@fr.com