

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 IPR2024-01006¹
Patent 8,808,909

PETITIONER'S REQUEST FOR ORAL ARGUMENT

¹ Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. were joined as parties to this proceeding via a Motion for Joinder in IPR2025-00356.

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 9), Petitioner submits this Request for Oral Argument on the instituted unpatentability grounds regarding U.S. Patent No. 8,808,909. A request for Oral Argument in related IPR proceedings IPR2024-01011 and IPR2024-01013 are being filed on this same day. Petitioner requests an in-person hearing at the USPTO's Alexandria office, and 90 minutes per party of oral argument time collectively for these three proceedings (IPR2024-01006, IPR2024-01011, and IPR2024-01013). At the oral argument, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether claims 1-2 and 5-8 are unpatentable over Lee and Wepasnick, pursuant to 35 U.S.C. §103;
2. Whether claims 1-2 and 5-8 are unpatentable over Ohata and Kavan, pursuant to 35 U.S.C. §103;
3. Whether claims 3-4 are unpatentable over Lee, Wepasnick and Zhamu, pursuant to 35 U.S.C. §103;
4. Any claim construction issues;
5. Any procedural and/or evidentiary issues;
6. Rebuttal to Patent Owner's presentation on all matters; and

7. 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

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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:

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