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 IPR2024-01012[1]
U.S. Patent 10,608,282

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

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[1] Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., which filed a petition in IPR2025-00358, have been joined as petitioners in this proceeding.

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 9) Patent Owner Molecular Rebar Design, LLC requests oral argument in this proceeding. Patent Owner specifies the following issues to be argued: (1) whether Petitioner has shown by a preponderance of the evidence that the asserted grounds possess all limitations of all challenged claims; (2) whether Petitioner has shown by a preponderance of the evidence that all challenged claims would have been obvious to a person of ordinary skill in the art at the time of the invention; and (3) any other matter in the parties' filings relevant to the foregoing issues.

Patent Owner requests at least the same amount of time the Board allots for Petitioner's argument.

Dated: August 4, 2025

Respectfully submitted,

/Stephen D. Zinda/
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Registration No. 67,272
Counsel for Patent Owners

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4), the undersigned certifies that on August 4, 2025, the foregoing document was served via electronic mail on the following attorneys of record at the indicated e-mail address, which Petitioner has consented to electronic service for:

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