

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THERMALTAKE TECHNOLOGY CO., LTD. and

THERMALTAKE INC.,

Petitioner,

v.

CHEN, CHIEN-HAO,

Patent Owner.

IPR2024-01230

U.S. Patent No. 10,690,336 B1

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper 13) and September 22, 2025 email (Ex-3006), Patent Owner Chen, Chien-Hao ("Patent Owner") respectfully requests oral argument on issues relating to the patentability of claims 1-5 (collectively, the "Challenged Claims") of the U.S. Patent No. 10,690,336 ("the '336 patent") and Patent Owner's Revised Motion to Amend (Paper 28, hereinafter "RMTA"). The Board originally scheduled the oral argument on November 18, 2025, but because of Patent Owner's filing of the RMTA, "the Board will issue a revised scheduling order that reflects the parties' requested schedule along with any additional changes required by the Board." (Ex-3006.) Accordingly, Patent Owner requests that the oral argument be conducted in-person at the USPTO's headquarters in Alexandria, VA on a date to be ordered by the Board (*see id.*), and that each party be given a total of sixty (60) minutes of time for its respective presentation, inclusive of any time reserved for rebuttal.

Patent Owner requests permission to use audiovisual equipment to display demonstratives. Patent Owner is expecting two (2) attendees to attend the oral argument and requests that two spaces be reserved for counsel at counsel's table. Patent Owner also requests that the attorneys at Patent Owner's counsel's table be allowed to use computers.

Patent Owner seeks to address the following issues at oral argument, without intending to waive consideration of any issues not requested to be argued in this

proceeding:

1. Whether the Petition fails to establish that the Challenged Claims of the '336 patent are unpatentable based on the alleged Grounds;
2. Whether the RMTA should be granted if either or both of the original claims 2 and 3 of the '336 patent are found to be unpatentable;
3. Procedural, evidentiary, or other issues raised by the parties or the Board in this proceeding;
4. Rebuttal to all issues and arguments raised by Petitioner; and
5. Any responses to issues raised by the Board at the hearing.

Respectfully submitted,

GREENBERG TRAURIG, LLP

Date: October 8, 2025

By: /s/ Kyle Chen
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Counsel for Patent Owners

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of this **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** has been electronically served on Petitioner by emailing the following addresses:

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GREENBERG TRAURIG, LLP

Date: October 8, 2025

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