

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

XIFI NETWORKS R&D, INC.,
Patent Owner.

Case IPR2025-01206 (Patent No. 11,950,105)
Case IPR2025-01207 (Patent No. 12,015,933)
Case IPR2025-01208 (Patent No. 11,974,143)
Case IPR2025-01209 (Patent No. 11,856,414)

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70**

Pursuant to 37 C.F.R. § 42.70, Patent Owner hereby respectfully requests oral argument. The Scheduling Orders in each of the three above-captioned matters set one day, September 29, 2026, for oral argument. Paper 13 (IPR2025-01206); Paper 13 (IPR2025-01207); Paper 14 (IPR2025-01208); Paper 13 (IPR2025-01209). Given the overlapping issues between the four matters and the single noticed date before a single panel, Patent Owner requests that the matters be heard in a single, consolidated oral argument.

Patent Owner notes that seven other proceedings regarding related patents are noticed for adjacent days before separate, though overlapping, panels:

Panel/Oral Argument Date	AIA Review Number	Patent Number
Bui, Hamann, Belisle (September 29)	IPR2025-01204	11,818,591
	IPR2025-01205	12,003,976
	PGR2025-00068	12,169,756
	PGR2025-00069	12,250,564
Trock, Hamann, Cygan (October 1)	IPR2025-01203	11,849,337
	IPR2025-01270	12,114,177
	PGR2025-00067	12,190,198

The issues that will be presented in the eleven proceedings before the three panels are substantially overlapping, including relating to the same prior art references and substantive arguments made by the parties.

In order to conserve Board and party resources and to prevent the possibility of inconsistent decisions, Patent Owner requests that all eleven proceedings are heard as a single, consolidated oral argument on whichever of the previously-noticed days is most convenient for the Board.

Patent Owner has conferred with Petitioners; Petitioners have indicated they oppose consolidation of all eleven matters, but agree to consolidation of the four matters before this panel.

To the extent the Board schedules consolidated oral argument for Case Nos. in IPR2025-01204, IPR2025-01205, PGR2025-00068, and PGR2025-00068, Patent Owner respectfully requests a total of three hours on the record in a one-day hearing, with ninety minutes per side. To the extent the Board schedules consolidated oral argument for all eleven proceedings, Patent Owner respectfully requests a total of six hours on the record, with three hours per side.

Should the Board consolidate argument in Case Nos. IPR2025-01204, IPR2025-01205, PGR2025-00068 and PGR2025-00069, issues to be argued include:

1. Whether claims 1-26 of U.S. Patent No. 11,818,591 are rendered obvious by WO 2013/126859 (“Chincholi”) in view of Published U.S. Patent Application 2011/0320625 (“Riggert”);
2. Whether claims 1-30 of U.S. Patent No. 12,169,756 are rendered obvious by Chincholi in view of U.S. No. Patent 9,055,592 (“Clegg”);
3. Whether claims 1-30 of U.S. Patent No. 12,003,976 are rendered obvious by Chincholi in view of Riggert and Clegg;

4. Whether claims 1-29 of U.S. Patent No. 12,250,564 are rendered obvious by Chincholi in view of Clegg and U.S. Patent No. 7,206,840 (“Choi”);
5. Whether claims 1-30 of U.S. Patent 12,169,756 and claims 1-29 of U.S. Patent No. 12,250,564 are directed to ineligible subject matter;
6. Whether claims 1-30 of U.S. Patent 12,169,756 and claims 1-29 of U.S. Patent No. 12,250,564 lack sufficient written description;
7. Whether claims 1-30 of U.S. Patent 12,169,756 and claims 1-29 of U.S. Patent No. 12,250,564 are indefinite; and
8. Any issues raised by the parties in any filings contemporaneous with or subsequent to this Request.

Should the Board consolidate argument in Case Nos. IPR2025-01203, -01204, -01205, -01206, -01207, -01208, -01209, and -01270 and PGR2025-00067, -00068, and -00069, issues to be argued include:

1. Whether claims 1-30 of U.S. Patent No. 11,849,337, claims 1-26 of U.S. Patent No. 11,818,591, claims 1-30 of U.S. Patent 11,974,143, and claims 1-2 and 13-30 of U.S. Patent No. 11,856,414 are rendered obvious by Chincholi in view of Riggert;
2. Whether claims 1-26 of U.S. Patent No. 12,114,177, claims 1-30 of U.S. Patent No. 12,190,198, and claims 1-30 of U.S. Patent

- 12,169,756 are rendered obvious by Chincholi in view of Clegg;
3. Whether claims 1-30 of U.S. Patent No. 12,003,976, claims 1-30 of U.S. Patent No. 11,950,105, claims 1-30 of U.S. Patent No. 12,015,933 are rendered obvious by Chincholi in view of Riggert and Clegg;
 4. Whether claims 19-29 of U.S. Patent 11,974,143 and claims 3-12 of 11,856,414 are rendered obvious by Chincholi in view of Riggert and Choi;
 5. Whether claims 1-29 of U.S. Patent No. 12,250,564 are rendered obvious by Chincholi in view of Clegg and Choi;
 6. Whether claims 1-30 of U.S. Patent No. 12,190,198, claims 1-30 of U.S. Patent 12,169,756, and claims 1-29 of U.S. Patent No. 12,250,564 are directed to ineligible subject matter;
 7. Whether claims 1-30 of U.S. Patent No. 12,190,198, claims 1-30 of U.S. Patent 12,169,756, and claims 1-29 of U.S. Patent No. 12,250,564 lack sufficient written description;
 8. Whether claims 1-30 of U.S. Patent No. 12,190,198, claims 1-30 of U.S. Patent 12,169,756, and claims 1-29 of U.S. Patent No. 12,250,564 are indefinite; and
 9. Any issues raised by the parties in any filings contemporaneous with

or subsequent to this Request.

Dated: August 11, 2026

Respectfully Submitted,

/Cyrus A. Morton/

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Patent Owner's Request for Oral Argument was served on August 11, 2026, by electronic mail to Petitioners' counsel at the following addresses indicated in Petitioners' Mandatory Notices:

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