

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.

Petitioners,

v.

OURARING, INC.,
Patent Owner.

Case: PGR2024-00030

U.S. Patent No. 11,868,178

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Patent No. 11,868,178
Patent Owner's Request for Oral Argument

Pursuant to 37 C.F.R. 42.70(a), Patent Owner Ouraring, Inc. requests oral argument on the issues set forth below at the place and time set by the Board. Oral Argument is currently scheduled for September 11, 2025. (Paper 10). The Board also has scheduled the Oral Hearing for related proceeding PGR2024-00039 on the same day.

The parties have agreed to consolidate oral argument for this proceeding with the co-pending proceeding PGR2024-00039. Patent Owner requests that each side be allotted one hundred twenty (120) minutes in the consolidated oral hearing to present its arguments, inclusive of time reserved for rebuttal/sur-rebuttal. A consolidated hearing would be more efficient for the Board and the parties because the proceedings involve the same parties, challenged patents with related subject matter, and certain overlapping prior art references.

The issues to be presented at Oral Argument include:

1. Arguments and evidence that Claims 1-3 and 17-18 are patentable over Schröder in view of the knowledge of a POSITA;
2. Arguments and evidence that Schröder does not enable a POSITA to make and use the invention;
3. Arguments and evidence that there is no motivation to combine Schröder and Niwa;
4. Arguments and evidence that Claims 1-3 and 13-16 are patentable over

Schröder in view of Niwa;

5. Arguments and evidence that Schröder in view of Niwa does not enable a POSITA to make and use the invention;
6. Arguments and evidence that there is no motivation to combine Schröder and Mestas;
7. Arguments and evidence that Claims 12 and 3 are patentable over Schröder in view of Mestas;
8. Arguments and evidence that there is no motivation to combine Schröder and Yuen;
9. Arguments and evidence that Schröder in view of Yuen does not enable a POSITA to make and use the invention;
10. Arguments and evidence that Claims 1, 4-11, and 13-16 are patentable over Schröder in view of Yuen;
11. Arguments and evidence that Claims 1-3 and 13-18 are patentable over Niwa
12. Arguments and evidence that Niwa does not enable a POSITA to make and use the invention;
13. Arguments and evidence that there is no motivation to combine Niwa and Schröder;
14. Arguments and evidence that Claim 1 is patentable over Niwa in view

of Schröder;

15.Arguments and evidence that Niwa in view of Schröder in does not enable a POSITA to make and use the invention;

16.Arguments and evidence that there is no motivation to combine Niwa, Schröder, and Mestas;

17.Arguments and evidence that there is no motivation to combine Niwa, and Mestas;

18.Arguments and evidence that Claim 12 is patentable over Niwa in view of Mestas;

19.Arguments and evidence that Claim 12 is patentable over Niwa in view of Schröder and Mestas;

20.Arguments and evidence that Niwa in view of Mestas does not enable a POSITA to make and use the invention;

21.Arguments and evidence that Niwa in view of Schröder and Mestas does not enable a POSITA to make and use the invention;

22.Arguments and evidence that there is no motivation to combine Niwa, and Yuen;

23.Arguments and evidence that there is no motivation to combine Niwa, Schröder, and Yuen;

24.Arguments and evidence that Claims 4-11 are patentable over Niwa in

view of Yuen;

25.Arguments and evidence that Claim 4-11 are patentable over Niwa in

view of Schröder and Yuen;

26.Arguments and evidence that Niwa in view of Yuen does not enable a

POSITA to make and use the invention;

27.Arguments and evidence that Niwa in view of Schröder and Yuen does

not enable a POSITA to make and use the invention;

28.Arguments and evidence that secondary considerations support a

finding of nonobviousness;

29.Rebuttal to Petitioner's arguments and evidence on all matters

including the issues listed above;

30.Any procedural or evidentiary issues raised; and

31.Any other issues that the Board deems necessary for issuing a Final

Written Decision, including any questions, rebuttals, or arguments that

may arise during the oral argument.

Patent Owner requests and would prefer that the oral hearing take place at USPTO headquarters in Alexandria, VA. Patent Owner requests the ability to use audiovisual equipment to display demonstrative exhibits and evidence of record, including the use of a projector and screen for computer-generated slides and a document camera/projector for displaying documents.

Dated: July 31, 2025

Respectfully submitted,

/s/ Jasjit S. Vidwan

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on July 31, 2025, I caused a true and correct copy of the Updated Mandatory Notices and Power of Attorney to be served via email to the following address:

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