UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SILICON LABORATORIES, INC. Petitioner

v.

CRESTA TECHNOLOGY CORPORATION Patent Owner

> CASE: IPR2015-00626 Patent No. 7,265,792

Title: Television Receiver for Digital and Analog Television Signals

PETITIONER'S REQUEST FOR ORAL ARGUMENT 37 C.F.R. § 42.70 In accordance with 37 C.F.R. § 42.70(a), Petitioner respectfully requests an opportunity to present oral argument before the Board. Oral argument is presently scheduled for April 12, 2016 in IPR2015-00615 relating to U.S. Patent No. 7,075,585 ("the '585 patent) and IPR2015-00626 relating to U.S. Patent No. 7,265,792 ("the '792 patent"). *See* Order, Paper 26, p.2. As to the '792 patent, Petitioner anticipates addressing the following issues in its argument:

- Whether claim 29 is unpatentable under 35 U.S.C. § 103(a) over Thomson and Harris;
- 2. Whether claims 24 and 25 are unpatentable under 35 U.S.C. § 103(a) over Thomson, Harris, and Grumman;
- Whether claims 26 and 28 are unpatentable under 35 U.S.C. § 103(a) over Thomson, Harris, and Zenith;
- Whether claim 27 is unpatentable under 35 U.S.C. § 103(a) over Thomson, Harris, Zenith, and Birleson; and
- 5. Whether claims 18 and 19 is unpatentable under 35 U.S.C. § 103(a) over Thomson, Harris, Oku, Ericsson, and Nguyen;
- 6. Reply to any arguments raised in Patent Owner's Response;

IPR2015-00626 U.S. Pat. No. 7,265,792

- Respond to any issues specified by Patent Owner in its request for oral argument;
- 8. Respond to Patent Owner's presentation on all matters; and
- 9. Any additional issues on which the Board seeks clarification.

Lead counsel for Petitioner met and conferred with backup counsel for Patent Owner and the parties agree that the hearings in IPR2015-00615 and IPR2015-00626 could be concluded in one half-day session. Petitioner requests 90 minutes collectively to present its arguments on both matters. Petitioner also requests the ability to use audio-visual equipment to display demonstrative exhibits, including the use of a projector and screen for power point display.

Dated: March 14, 2016.

/Peter J. Ayers/

Peter J. Ayers, Reg. No. 38,374 Email: peter@leehayes.com LEE & HAYES, PLLC 11501 Alterra Parkway, Suite 450 Austin, TX 78758 Phone: (512) 605-0252 Facsimile: (512) 605-0269

Attorneys for Petitioner Silicon Laboratories, Inc. IPR2015-00626 U.S. Pat. No. 7,265,792

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March, 2016, the foregoing PETITIONER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70 was served upon Patent Owner's attorney of record by emailing to the following addresses:

Michael R. Fleming Lead Counsel for Patent Owner Irell & Manella LLP 1800 Avenue of the Stars Suite 900 Los Angeles, CA 90067 <u>CrestaIPRs@irell.com</u>

Mihai Murgulescu Cresta Technology Corporation 3900 Freedom Circle, Suite 201 Santa Clara, CA 95054 Mihai.murgulescu@crestatech.com Benjamin Haber Backup Counsel for Patent Owner Irell & Manella LLP 1800 Avenue of the Stars Suite 900 Los Angeles, CA 90067 <u>CrestaIPRs@irell.com</u>

/Peter J. Ayers/

Peter J. Ayers, Reg. No. 38,374 Email: peter@leehayes.com LEE & HAYES, PLLC

Attorney for Petitioner Silicon Laboratories, Inc.