

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT AND TRIAL APPEAL BOARD

ARKEMA FRANCE,
Petitioner,

v.

HONEYWELL INTERNATIONAL INC.,
Patent Owner.

Case IPR2015-00916
Patent 8,710,282

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and in accordance with the Board's Scheduling Order (paper no. 17), Patent Owner Honeywell International Inc. ("Patent Owner") requests oral argument before the Board in this *inter partes* review. In light of the Scheduling Order (paper no. 17), the oral argument is currently scheduled to occur on July 18, 2016. Patent Owner respectfully requests one hour in which to present its arguments and the necessary equipment to project related demonstratives.. Patent Owner requests that two counsel at the counsel's table be allowed to use their computers at the hearing (in addition to the counsel making the argument using his or her computer to show the demonstratives), to avoid the need for the parties to bring entire paper copies of the record into the hearing room and to facilitate efficient answering of panel questions. Patent Owner also requests that portions of the oral hearing be closed to the public and portions of the oral hearing transcript be designated as confidential to accommodate the confidential exhibits that Patent Owner has submitted and relied on in this proceeding.

Without intending to waive any issue not specifically identified, Patent Owner specifies the following issues to be argued:

1. The broadest reasonable interpretation of the claims, to include whether the broadest reasonable interpretation of the term "spent DHA" in Claims 1, 10, and 13 of U.S. Patent No. 8,710,282 (the '282

patent) requires the term to be construed as “an aqueous solution containing DHA and by-product salts.”

2. Whether the broadest reasonable interpretation of the phrase “recovering spent DHA” in Claims 1 and 10 of the ’282 patent requires the phrases to be construed as “substantially separating spent DHA from any other materials in the reaction stream.”
3. Whether Claims 1-20 of the ’282 patent are obvious under § 103(a) by the combination of Smith (EX1003), Masayuki (EX1005), and Harrison (EX1006).
4. Whether Smith (EX1003) is prior art to the ’282 patent.
5. The scope and content of Petitioner’s reply.
6. Any additional issues raised by the Petitioner during oral argument.

No fees are believed to be required for filing this request; however, the Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment, to Deposit Account No. 16-0605.

Dated: June 13, 2016

Respectfully submitted,

By: */Bruce J. Rose/*
Bruce J. Rose (Reg. No. 37,431)
S. Benjamin Pleune (Reg. No. 52,421)
Christopher TL Douglas (Reg. No. 56,950)

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that, on June 13, 2016, a true copy of the foregoing **Patent Owner's Request for Oral Argument**, was served by electronic mail on:

Jon Beaupré
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