

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.,  
Petitioner,

v.

PROMOS TECHNOLOGIES, INC.,  
Patent Owner.

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Case IPR2019-00779  
Patent 6,163,492

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**PATENT OWNER PROMOS TECHNOLOGIES, INC.'S  
REQUEST FOR ORAL ARGUMENT**

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
PO Box 1450  
Alexandria, Virginia 22313-1450

Pursuant to the Board's Order (Paper 19), ProMOS respectfully requests that the Board hear oral argument, currently scheduled for July 8, 2020, on the issues raised in the Petition for *Inter Partes* review, Patent Owner's Preliminary Response, Patent Owner's Response, Petitioner's Reply to the Response, and any other papers filed in this proceeding.

ProMOS requests that the parties be given 1 hour of total argument time for a combination of this proceeding and related proceedings IPR2019-00780 and IPR2019-00781, with 30 minutes allocated to the Petitioner and 30 minutes allocated to the Patent Owner. The argument will address the following issues:

1. Whether claims 14-19 are anticipated in light of Fu;
2. Whether claims 14-19 are anticipated in light of McAdams;
3. Whether claims 14-19 are obvious in light of Fu and Sugibayashi;
4. Whether claims 14-19 are obvious in light of McAdams and Sugibayashi;
5. The proper construction of the claim term "a terminal T1 for providing a signal indicating a state of the programmable latch;"
6. The proper construction of the claim term "throughout operation of the latch;"
7. Any issues identified in Petitioner's Request for Oral Argument.

If the hearing is held in person, ProMOS respectfully requests the Board to permit its use of audio visual equipment, including the use of a projector, screen and computer, to display exhibits and demonstratives. If the hearing is held virtually, ProMOS respectfully requests the Board to allow technology that will allow ProMOS to share presentation materials in the form of .ppt or .pdf files.

Dated: June 1, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 1, 2020, a true and correct copy of the foregoing *Patent Owner ProMOS Technologies, Inc.'s Request for Oral Argument* was served via email to the Petitioners by serving the correspondence email addresses of record as follows:

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