

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, and  
SAMSUNG ELECTRONICS AMERICA, INC.,

Petitioner,

v.

CELLECT, LLC,

Patent Owner.

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Case IPR2020-00512

U.S. Patent No. 9,186,052

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**PETITIONER'S REQUEST FOR ORAL HEARING**

Pursuant to 37 C.F.R. § 42.70, Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (“Petitioner”), submit this Request for Oral Hearing on the instituted grounds of unpatentability for claim 2 of U.S. Patent No. 9,186,052 under 35 U.S.C. § 103(a) and associated issues. Petitioner also requests rebuttal to respond to all issues raised by Patent Owner’s presentation.

Petitioner intends to discuss the issues raised in the parties’ filings under the ongoing reviews, including but not limited to, the following items:

1. Any issues addressed by Petitioner, including in the Petition for Inter Partes Review and Reply, including the patentability of claim 2 of U.S. Patent No. 9,186,052.
2. Any issues properly raised by Patent Owner, including in Patent Owner Responses.
3. Rebuttal to issues raised by Patent Owner, including in any Responses, motions to exclude or requests for oral argument.
4. Any other issues related to invalidity that the Board deems necessary for issuing a final written decision.

The Board already scheduled Oral Hearing for this and a related proceeding—IPR2020-00475 for the U.S. Patent 9,186,052 (claims 1, 3, and 7)—for May 26, 2021. Similar claims are at issue in both proceedings. Petitioner therefore requests Oral Hearing for IPR2020-00512 and IPR2020-00475. Petitioner believes that the

Oral Hearings should be consolidated and each side should be limited to seventy-five (75) minutes of oral argument. The two proceedings involve the same patent with overlapping claim scope but rely on different prior art grounds. Accordingly, Petitioner proposes that arguments for both IPRs be jointly held with an allocation of seventy-five (75) minutes per side, with the opportunity to reserve time for rebuttal for Petitioner. Petitioner will present arguments first, followed by Patent Owner's arguments, and then followed by any time reserved for rebuttal.

Furthermore, in view of the USPTO's update on oral hearings scheduled to take place at USPTO offices on or after Friday, March 13, 2020, Petitioner intends to participate via remote video and/or telephone. Petitioner requests the ability to use audio/visual equipment to display demonstratives and exhibits at the oral hearing, to the extent available at the time of the hearing.

If the Board decides to hold an in-person hearing, Petitioner requests that two spaces be reserved for counsel at counsel's table and five additional spaces be reserved in the hearing room to accommodate additional counsel and corporate representatives. Petitioner also requests that the attorneys at Petitioner's counsel table be allowed to use computers.

Dated: April 5, 2021

Respectfully submitted,

By: /Scott A. McKeown/

Scott A. McKeown

Reg. No. 42,866

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*Counsel for Petitioner*

*Samsung Electronics Co., Ltd., and*

*Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing PETITIONER'S REQUEST FOR ORAL HEARING was served in its entirety by filing through the Patent Trial and Appeal Board End to End (PTAB E2E), as well as providing a courtesy copy via e-mail to the following attorneys of record for Patent Owner listed below:

<b>Lead Counsel</b>	<b>Back-up Counsel</b>
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Dated: April 5, 2021

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