

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.

WARD PARTICIPATIONS B.V.,  
Patent Owner.

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Case PGR2022-00007  
Patent 10,992,480

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 9), Petitioner submits this Request for Oral Argument on all of the instituted unpatentability grounds regarding U.S. Patent No. 10,992,480 and U.S. Patent No. 11,063,766. Petitioner requests a consolidated oral argument in IPR2022-00113, IPR2022-00114, and PGR2022-00007 and requests one hour per party of oral argument time. At the oral argument, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether claims 1-19 are unpatentable for lack of written description pursuant to 35 U.S.C. §112(a);
2. Whether claims 1, 3, 6, 11, and 14–19 are unpatentable over Ellison (U.S. Patent No. 7,082,615) and Muir (PCT Patent Publication No. WO 01/93212) pursuant to 35 U.S.C. §103;
3. Whether claims 7, 9, and 13 are unpatentable over Ellison, Muir and Al-Salqan (U.S. Patent No. 6,549,626) pursuant to 35 U.S.C. §103;
4. Whether claims 8, 10, and 12 are unpatentable over Ellison, Muir and Searle (U.S. Patent No. 6,683,954) pursuant to 35 U.S.C. §103;
5. Whether claims 1, 3-4, 8-9, 13, and 21-33 are unpatentable over Ellison (U.S. Patent No. 7,082,615) and Muir (PCT Patent Publication No. WO 01/93212) pursuant to 35 U.S.C. §103;

6. Whether claims 10 and 12 are unpatentable over Ellison, Muir and Al-Salqan (U.S. Patent No. 6,549,626) pursuant to 35 U.S.C. §103;
7. Whether claim 11 is unpatentable over Ellison, Muir, Al-Salqan and Searle (U.S. Patent No. 6,683,954) pursuant to 35 U.S.C. §103;
8. Whether claim 5 is unpatentable over Ellison, Muir and Epstein (U.S. Patent No. 6,694,025) pursuant to 35 U.S.C. §103;
9. Any claim construction issues;
10. Any procedural and/or evidentiary issues;
11. Rebuttal to Patent Owner's presentation on all matters; and
12. Any additional issues on which the Board seeks clarification.

The Board scheduled the Oral Argument for this proceeding on January 26, 2023 at the USPTO Rocky Mountain Regional Office in Denver, Colorado. Petitioner requests 60 minutes per side to present arguments in this case. To the extent the Board schedules the hearing to last more than 120 minutes, Petitioner requests that it be given half the length of the hearing to address these issues.

Petitioner requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen that connects to a laptop computer. Petitioner's counsel will use a laptop computer with an HDMI-

type connector. In addition, Petitioner requests that an ELMO-type projector be made available for use.

If Patent Owner requests a remote hearing, Petitioner does not object to a remote hearing.

Respectfully submitted,

Date: December 13, 2022

/Usman Khan/

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**CERTIFICATE OF SERVICE**

Pursuant to 37 CFR §§ 42.6(e)(1) and 42.6(e)(4)(iii), the undersigned certifies that on December 13, 2022, a complete and entire copy of this Petitioner's Request for Oral Argument was provided by email to the Patent Owner by serving the email correspondence addresses of record as follows:

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