

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

WINTEK CORPORATION  
Petitioner,

v.

TPK TOUCH SOLUTIONS INC.  
Patent Owner

---

Case IPR 2013-00567  
Case IPR 2014-00541  
U.S. Patent No. 8,217,902

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT  
PURSUANT TO 37 C.F.R. § 42.70(a)**

Patent TPK Touch Solutions, Inc. (“TPK”) hereby requests oral argument pursuant to 37 C.F.R. §42.70(a). According to the Scheduling Order (Paper No. 11) entered on February 27, 2014, oral argument is currently scheduled for December 12, 2014. TPK specifies the following issues to be addressed:

1. The proper construction of certain claim terms under the broadest reasonable interpretation standard.
2. Whether claims 1-68 of U.S. Patent No. 8,217,902 are patentable over the asserted art and the grounds of unpatentability on which IPR2013-00567 and IPR2014-00241 were instituted.
3. Whether TPK’s Motion to Exclude should be granted.
4. Any issues specified by Wintek Corporation in its Request for Oral Argument.
5. Any other issues that the Board deems necessary for issuing a final written decision.

TPK requests that the Board provide audio-visual equipment to display demonstrative exhibits, including the use of an overhead projector and screen for displaying documents.

Date: October 31, 2014

Respectfully submitted,

By: Joseph J. Richetti, Reg. No. 47024/  
Joseph J. Richetti, Reg. No. 47,024  
BRYAN CAVE LLP  
1290 Avenue of the Americas  
New York, NY 10104  
General Tel: (212) 541-2000  
Direct Tel: (212) 541-1092  
Fax: (212) 541-4630  
Email: [joe.richetti@bryancave.com](mailto:joe.richetti@bryancave.com)

David Bilsker, Reg. No. 39,611  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
General Tel: (415) 875-6600  
Direct Tel: (415) 875-6432  
Fax: (415) 875-6700  
Email: [davidbilsker@quinnemanuel.com](mailto:davidbilsker@quinnemanuel.com)

*Attorney for Patent Owner –  
TPK Touch Solutions Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing PATENT OWNER'S  
REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70(a) was  
served electronically via e-mail on October 31, 2014, in its entirety on the  
following:

Joseph E. Palys  
PAUL HASTINGS LLP  
875 15<sup>th</sup> Street, N.W.  
Washington, DC 20005  
[josephpalys@paulhastings.com](mailto:josephpalys@paulhastings.com)

Naveen Modi  
PAUL HASTINGS LLP  
875 15<sup>th</sup> Street, N.W.  
Washington, DC 20005  
[naveen.modi@paulhastings.com](mailto:naveen.modi@paulhastings.com)

Respectfully submitted,

By: /Joseph J. Richetti, Reg. No. 47024/  
Joseph J. Richetti  
Lead Attorney for Patent Owner  
Reg. No. 47,024  
BRYAN CAVE LLP  
1290 Avenue of the Americas  
New York, NY 10104  
General Tel: (212) 541-2000  
Direct Tel: (212) 541-1092  
Fax: (212) 541-4630  
Email: [joe.richetti@bryancave.com](mailto:joe.richetti@bryancave.com)

*Attorney for Patent Owner –  
TPK Touch Solutions Inc.*

Date: October 31, 2014