

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELL INC., HEWLETT-PACKARD COMPANY, and NETAPP, INC.,
Petitioners,

v.

ELECTRONICS AND TELECOMMUNICATIONS RESEARCH INSTITUTE,
Patent Owner.

Case IPR2013-00635
Patent No. 6,978,346

PETITIONER'S REQUEST FOR ORAL ARGUMENT

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In accordance with 37 C.F.R. § 42.70(a), Petitioners Dell Inc., Hewlett-Packard Company, and NetApp, Inc. hereby request oral argument in the present *inter partes* review. The issues to be argued include:

- I. Hathorn discloses a “RAID,” “a first RAID controlling unit,” and “a second RAID controlling unit”
- II. PO’s explanations of “RAID” and “RAID controlling unit” are improperly narrow
- III. Hathorn’s ports teach “network [interface] controlling units”
- IV. PO’s construction of “network [interface] controlling unit” is not the broadest reasonable construction
- V. The term “connected” in claims 2, 3, and 8 includes connections through hubs or switches
- VI. Hathorn teaches the “hub equipment” of Claim 5
- VII. Hathorn teaches the “rest of the connection ports being provided as...[hub equipment/network switch equipment] connected with the numerous host computers” limitations recited in claims 5-7
- VIII. Other issues raised in papers filed in the present proceeding, including issues raised in papers yet to be filed.


In light of these remarks, Petitioners respectfully request the opportunity to present oral arguments before the Board on December 18, 2014. (*See* Scheduling Order, Paper 20, p. 5). If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference.

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No fees are required for filing this request; however, the Commissioner is authorized to charge any required fees, or credit any overpayment, to Haynes and Boone, LLP's Deposit Account No. 08-1394.

Respectfully submitted,

Dated: November 7, 2014

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies service on the Patent Owner a copy of this Request for Oral Argument as detailed below.

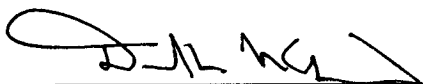
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