

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 No. IPR2013-00635

Patent No. 6,978,346

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 16), the Patent Owner requests oral argument, which is currently scheduled for December 18, 2014. The Patent Owner expects to argue the following issues at the oral argument:

- (1) Whether the Petitioner has met its burden to show that Hathorn anticipates claims 1-3 and 5-8 of the '346 Patent.
- (2) Claim interpretations relevant to issue (1), including, for example, the interpretation of "RAID," "RAID Controlling Unit," "First RAID Controlling Units," "Second RAID Controlling Unit," "Network Controlling Unit," and "Hub."

The Patent Owner requests one hour of argument time to address these issues.

The Patent Owner also kindly requests that the Board provide a projector and screen for use during the oral argument.

Respectfully submitted
on behalf of the Patent Owner,

Date: 2014 Nov. 10

By: / M.C. Phillips /

Alexander C.D. Giza
Reg. No. 51,740
Backup Counsel for Patent Owner

Russ August & Kabat
12424 Wilshire Blvd., 12th Floor
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991
agiza@raklaw.com

Matthew C. Phillips
Reg. No. 43,403
Lead Counsel for Patent Owner

Renaissance IP Law Group LLP
9600 SW Oak Street, Suite 560
Portland, Oregon 97223
Telephone: (503) 964-1129
Facsimile: (503) 517-9919
matthew.phillips@renaissanceiplaw.com

Derek Meeker
Reg. No. 53,313
Backup Counsel for Patent Owner

Renaissance IP Law Group LLP
9600 SW Oak Street, Suite 560
Portland, Oregon 97223
Telephone: (360) 606-8922
Facsimile: (503) 517-9919
derek.meeker@renaissanceiplaw.com

CERTIFICATE OF SERVICE

I certify that on November 10, 2014, the foregoing paper, including all attached papers referenced therein, have been served on the Petitioners' counsel of record via email, as agreed to by counsel, at the following email addresses:

David McCombs: David.mcombs.ipr@haynesboone.com

Andrew S. Ehmke: andy.ehmke.ipr@haynesboone.com

Thomas W. Kelton: Thomas.kelton.ipr@haynesboone.com

John Russell Emerson: Russell.emerson.ipr@haynesboone.com

/ M.C. Phillips /

Matthew C. Phillips

Reg. No. 43,403