

Case IPR2014-00044
Patent 6,771,290 B1

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner v.

B.E. TECHNOLOGY, L.L.C.
Patent Owner

Case IPR2014-00044
Patent 6,771,290 B1

Before SALLY C. MEDLEY, KALYAN K. DESHPANDE, and LYNNE E.
PETTIGREW, Administrative Patent Judges.

PETITIONER'S JOINT REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), requiring a separate paper requesting oral argument and specifying issues to be argued, Petitioner Samsung Electronics America Inc. (“Samsung”) submits this Joint Request for Oral Argument. The Board has already scheduled the Oral Argument for December 11, 2014. Paper 12, p. 5 (Scheduling Order).

Inter partes review nos. IPR2014-00029 (Sony), IPR2014-00031(Google), IPR2014-0033 (Google), IPR2014-00040 (Microsoft) and IPR2014-00044 (Samsung) (“the ‘290 proceedings”), all challenge the patentability of claims in U.S. Patent No. 6,771,290. Accordingly, the Petitioners of the ‘290 Proceedings (“Petitioners”) are coordinating their efforts so that the Board can efficiently conduct a single hearing on these related proceedings. Petitioners propose that they jointly present argument on the issues identified below, that Patent Owner follow with its response, and that Petitioners use their remaining time for rebuttal. Because some of the grounds in the five proceedings overlap and others do not, Petitioners plan to present their opening and rebuttal views through two designees, with other representatives offering additional views only if necessary.

The Petitioners request 90 minutes of argument time for Petitioners and 90 minutes of argument time for Patent Owner to address the following issues:

1. Grounds for which *inter partes* review was instituted as to claims 2-3 of the ‘290 patent in IPR2014-00029, Paper No. 7 (Institution Decision).

2. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00031, Paper No. 9 (Institution Decision).
3. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00033, Paper No. 9 (Institution Decision).
4. Grounds for which *inter partes* review was instituted as to claims 1-3 of the '290 patent in IPR2014-00040, Paper No. 12 (Institution Decision).
5. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00044, Paper No. 11 (Institution Decision).
6. Any issues properly raised by Patent Owner, including in Patent Owner's Responses in the '290 proceedings.
7. Any issues addressed by Petitioners, including Petitions for *Inter Partes* Review and Replies in the '290 proceedings.
8. Response to Patent Owner's arguments regarding the claim construction standard to be used in these proceedings, and relevance if any to the patentability issues raised by the original claims.
9. Issues related to all exhibits filed in this proceeding.
10. Rebuttal to issues raised by the Patent Owner.

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October 2014, a copy of this **PETITIONER'S JOINT REQUEST FOR ORAL ARGUMENT** has been served on Patent Owner as provided in 37 C.F.R. § 42.6(e) via electronic mail transmission addressed to the person(s) at the below address(es):

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Date: October 31, 2014