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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD.;
SAMSUNG ELECTRONICS AMERICA, INC.; and
SAMSUNG AUSTIN SEMICONDUCTOR, LLC;
Petitioner

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP
Patent Owner

Case No. IPR2014-00518
Patent 8,023,580

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
UNDER 37 C.F.R. § 42.70**

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
UNDER 37 C.F.R. § 42.70**

Rembrandt Wireless Technologies, LP (“Patent Owner”) respectfully requests oral argument in IPR2014-00518 (“the ‘518 IPR”) under 37 C.F.R. § 42.70(a). Pursuant to the Scheduling Order dated September 23, 2014 (Paper 17), oral argument is currently scheduled for April 24, 2015.

Patent Owner notes that oral argument in the related proceeding IPR2014-00519 (“the ‘519 IPR”) has also been scheduled for April 24, 2015. The ‘519 IPR involves the same asserted references as applied to a different set of claims from the same patent at issue in these proceedings. Patent Owner requests a single, consolidated hearing to present its combined arguments in the ‘518 IPR and ‘519 IPR in view of the common issues to be addressed. Patent Owner requests 30 minutes of total time.

Oral argument will focus on patentability of the challenged claims of the ‘580 Patent. The principal issues to be argued by Patent Owner’s counsel will be as follows:

- A. An overview of the ‘580 Patent and the challenged claims.
- B. The teachings of the art relied upon by the Petitioner (*i.e.*, alleged Admitted Prior Art (“APA”), U.S. Patent No. 5,706,428 of Boer (Ex. 1204) and the Upender/Koopman Article (Ex. 1218)).

- C. Petitioner's failure to demonstrate the obviousness of any of the challenged claims over the APA and Boer:
1. A person of ordinary skill in the art would not have been motivated to modify Boer as proposed by Petitioner
 - Unreliability of Petitioner's declarant's testimony (Ex. 1220) regarding purported motivation based on teachings of Upender/Koopman article
 - Testimony of co-author Dr. Koopman (Ex. 2208) that Boer teaches away from the proposed modification and that the Upender/Koopman article does not support such a combination
 2. Boer fails to disclose using at least two different "types" of modulation methods as alleged by Petitioner
 - proper construction of "types" of modulation methods
- D. Any additional issues for which the Board requests argument or any additional issue raised by Petitioner prior to or at oral argument (e.g., in any motion to exclude).

At the oral argument, the Patent Owner requests use of audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint display. In accordance with the Trial Practice Guide, 77

Fed. Reg. at 48768, Patent Owner will contact the Board Trial Division paralegal to discuss this request. Patent Owner additionally requests permission to present handouts of demonstrative exhibits during the oral argument.

Dated: March 20, 2015

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2015, a true and accurate copy of this paper, PATENT OWNER'S REQUEST FOR ORAL ARGUMENT, were served on the following counsel for Petitioner via email:

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