

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.,
SAMSUNG ELECTRONICS AMERICA, INC. AND
SAMSUNG ELECTRONICS CO., LTD.
Petitioners

v.

MICROGRAFX, LLC
Patent Owner

Case IPR2014-00532
Patent 5,959,633

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order (Paper 12 and Paper 27), Petitioner requests an opportunity to present oral argument regarding the patentability of the challenged claims of the '633 patent. Requests for Oral Argument in the three related IPR proceedings (IPR2014-00532, IPR2014-00533, and IPR2014-00534) have been filed on this same day. Petitioner believes that 1 hour for each side is sufficient to cover the issues related to these IPR matters.

With regard to the '633 patent, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether the challenged claims are unpatentable under 35 U.S.C. § 102 as anticipated by Walton;
2. Whether the challenged claims are unpatentable under 35 U.S.C. § 103 as obvious over Eick in view of Kruglinski;
3. Whether the Board should maintain the claim constructions set forth in the Institution Decision rather than adopt Patent Owner's competing claim constructions;
4. Whether the evidence and argument submitted by Petitioner demonstrate that the instituted claims are unpatentable;
5. Whether Patent Owner's Motion to Amend should be denied;
6. Whether Patent Owner's Motion to Exclude, if any, should be denied; and
7. Any additional issues on which the Board seeks clarification.

The Board has already scheduled an oral hearing for May 18, 2015. See Order dated February 19, 2015, Paper No. 27, at Page 2. Petitioner requests to use video equipment to display exhibits, including the use of a projector/screen for a PowerPoint display or the like.

Date: April 2, 2015

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Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on April 2, 2015, a complete and entire copy of this Petitioner's Request for Oral Argument was provided via email to the Patent Owner by serving the correspondence email addresses of record as follows:

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