

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

MICROGRAFX, LLC  
Patent Owner

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CASE IPR2014-00532  
Patent 5,959,633

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT  
PURSUANT TO 37 CFR § 42.70**

*Mail Stop "PATENT BOARD"*  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Patent Owner Micrografx, LLC (hereafter “Patent Owner”) hereby respectfully requests oral argument be held before the Board pursuant to 37 C.F.R. § 42.70 , on all of the instituted grounds of alleged unpatentability, on all issues briefed with respect thereto, and on Patent Owner’s motion to amend, including at least the following:

1. Whether Petitioners Google Inc., Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd (“Petitioners”) have met their burden to prove that Claims 1-4, 6, 8-11, 13, and 15 are anticipated under § 102 by U.S. Patent No. 5,883,639 to Walton et al. (“Walton”).
2. Whether Petitioners have met their burden to prove that Claims 1-4, 6, 8-11, 13, and 15 are obvious under § 103 by U.S. Patent No. 5,564,048 to Eick et al. (“Eick”) in view of *Inside Visual C++, Second Edition: Version 1.5* by David J. Kruglinski (“Kruglinski”).
3. Whether Patent Owner’s claim construction positions should be adopted.
4. If the Board determines that Petitioners have met their burden on one or more of the proposed grounds of invalidity, whether Patent Owner will be allowed substitute claims as requested in its Motion to Amend.
5. Whether Patent Owner’s claim construction positions in its Motion to Amend should be adopted.
6. Whether Petitioners’ Motion to Exclude, if any, should be denied.

Patent Owner requests to use a projector and screen to display exhibits and/or a slide presentation, such as PowerPoint, during any oral hearing.

Dated: April 3, 2015

Respectfully submitted,

By: /Douglas R. Wilson/  
Douglas R. Wilson (Reg. No. 54,542)  
Attorney for Patent Owner  
Micrografx, LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT UNDER 37 CFR § 42.70 was served via email to counsel of record for Petitioners as follows:

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Dated: April 3, 2015

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