

Filed on behalf of The Petitioners
By: David L. Cavanaugh, Reg. No. 36,476
Yung-Hoon Ha, Reg. No. 56,368
Wilmer Cutler Pickering Hale and Dorr LLP
1875 Pennsylvania Ave., NW
Washington, DC 20006
Tel: (202) 663-6000
Email: David.Cavanaugh@wilmerhale.com
Yung-Hoon.Ha@wilmerhale.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

The Gillette Company, Fujitsu Semiconductor Limited, and Fujitsu Semiconductor
America, Inc.
Petitioners,

v.

Zond, Inc.
Patent Owner of U.S. Patent No. 6,896,773

Trial No. IPR2014-00580

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Petitioner respectfully requests oral argument on the issues set forth below at a place and time set by the Board. Oral argument is presently scheduled for June 16, 2015 (Paper No. 12, Scheduling Order). To allow for a complete review of the issues presented in this proceeding, Petitioner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits. Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- I. Whether challenged claims 1, 6, and 8-20 are unpatentable under 35 U.S.C. § 103(a) as obvious over Mozgrin and Fortov.
- II. Whether challenged claim 5 is unpatentable under 35 U.S.C. § 103(a) as obvious over Mozgrin, Fortov and Kawamata.
- III. Whether challenged claims 3, 4 and 34-39 are unpatentable under 35 U.S.C. § 103(a) as obvious over Mozgrin, Fortov and Lantsman.
- IV. Whether challenged claim 7 is unpatentable under 35 U.S.C. § 103(a) as obvious over Mozgrin, Kudryavtsev and Fortov.
- V. Whether challenged claim 2 is unpatentable under 35 U.S.C. § 103(a) as obvious over Mozgrin, Mozgrin Thesis, Fortov and Raizer.
- VI. Reply to any arguments raised in Patent Owner's Response.
- VII. Respond to any issues specified by Patent Owner in its request for oral argument.

VIII. Respond to Patent Owner's presentation on all matters.

Respectfully Submitted,

/David L. Cavanaugh/

David L. Cavanaugh
Registration No. 36,476
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
david.cavanaugh@wilmerhale.com
Tel.: 202-663-6000
Fax: 202-663-6363

Dated: April 28, 2015

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2015, I caused a true and correct copy of the foregoing materials:

- Petitioner's Request for Oral Argument

to be served via e-mail, as previously agreed by the parties, on the following attorneys of record:

Dr. Gregory J. Gonsalves
2216 Beacon Lane
Falls Church, VA 22043
(571) 419-7252
gonsalves@gonsalveslawfirm.com

Bruce Barker
Chao Hadidi Stark & Barker LLP
176 East Main Street, Suite 6
Westborough, MA 01581
bbarker@chsblaw.com

/Yung-Hoon Ha/

Yung-Hoon Ha

Registration No. 56,368