

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
and
LG ELECTRONICS, INC., LG ELECTRONICS U.S.A., INC., and LG
ELECTRONICS MOBILECOMM U.S.A., INC.,
Petitioners,

v.

BLACK HILLS MEDIA, LLC,
Patent Owner.

IPR2014-00717
IPR2015-00335
Patent No. 6,108,686

**PETITIONERS' REQUEST FOR ORAL
ARGUMENT UNDER 37 C.F.R. § 42.70**

In accordance with 37 C.F.R. § 42.70(a) and the Scheduling Order (Paper No. 27) as modified by the Notice of Stipulation to Revised Schedule (Paper No. 28), Petitioners request the opportunity to present oral argument on all the instituted grounds of unpatentability for U.S. Patent No. 6,108,686 (*see* Paper No. 18, p. 15), which encompass each of the claim construction, anticipation and obviousness issues addressed in Petitioners' Petition and Reply, Patent Owner's Response, and all exhibits thereto, including declarations and depositions.

The instituted grounds and other issues to be addressed at oral argument include:

(1) Claims 1, 2, 20, 23, 29 and 30 are unpatentable under 35 U.S.C. § 102(e) as anticipated by the Reilly patent;

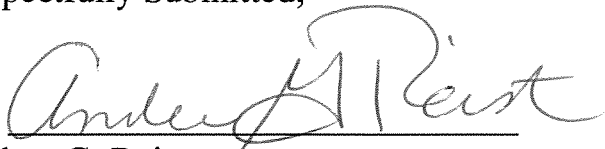
(2) Claims 1, 2, 20, 23, 29 and 30 are unpatentable under 35 U.S.C. § 103(a) as obvious over the Reilly patent and the Technology & Learning Article; and

(3) Rebuttal to Patent Owner's presentation on all matters, including: i) issues 1 and 2 above; ii) Patent Owner's observations on cross-examination of reply witness; and iii) any motion to exclude filed by Patent Owner.

Petitioners request 45 minutes of total argument time. Oral argument (Due Date 7) is scheduled for July 28, 2015 (Paper No. 27, p. 5).

Date: June 25, 2015

Respectfully Submitted,

By 
Andrea G. Reister

Registration No.: 36,253

Gregory S. Discher

Registration No.: 42,488

Covington & Burling LLP

One CityCenter, 850 Tenth Street, NW

Washington, DC 20001

(202) 662-6000

Attorneys for Petitioner Samsung

Doris Johnson Hines

Registration No.: 34,629

Jonathan R.K. Stroud

Registration No.: 72,518

Finnegan, Henderson, Farabow,

Garrett & Dunner LLP

901 New York Avenue, NW

Washington, DC 20001

(202) 408-4000

Attorneys for Petitioner LG


CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on this 25th day of June 2015, the foregoing Petitioners' Request for Oral Argument was served via electronic mail by agreement of the parties on the following counsel of record for Patent Owner.

N. Andrew Crain (Andrew.Crain@thomashorstemeyer.com)
Robert Gravois (Robert.Gravois@thomashorstemeyer.com)
Kenneth Knox (Kenny.Knox@thomashorstemeyer.com)
Thomas Horstemeyer LLP

Thomas Engellenner (engellennert@pepperlaw.com)
Reza Mollaaghababa (mollaaghababar@pepperlaw.com)
Lana Gladstein (gladsteinl@pepperlaw.com)
George S. Haight, IV (haightg@pepperlaw.com)
Pepper Hamilton LLP

Date: June 25, 2015


Andrea G. Reister, Esq.
Registration No.: 36,253