

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Eastman Kodak Company, AGFA Corporation,
Esko Software BVBA, and Heidelberg, USA,
Petitioners,

v.

CTP Innovations, LLC
Patent Owner.

Case IPR2014-00788
Patent 6,738,155

**CTP INNOVATIONS, LLC'S
REQUEST FOR ORAL ARGUMENT**

Filed on behalf of CTP Innovations, LLC

By:

W. Edward Ramage (Lead Counsel)
Reg. No. 50,810
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
Baker Donelson Center
211 Commerce Street, Suite 800
Nashville, Tennessee 37201
Tel: (615) 726-5771
Fax: (615) 744-5771
Email: eramage@bakerdonelson.com

L. Clint Crosby (Back-up Counsel)
Reg. No. 47,508
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
Monarch Plaza, Suite 1600
3414 Peachtree Ave., N.E.
Atlanta, Georgia 30326
Tel: (678) 406-8702
Fax: (678) 406-8802
Email: ccrosby@bakerdonelson.com

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order, Patent Owner CTP Innovations, LLC ("Patent Owner") respectfully requests oral argument. Specifically, Patent Owner requests oral argument on the following:

1. Each ground of unpatentability on which trial was instituted.
 - a. Whether the Jebens reference in combination with other prior art renders some or all of the subject claims obvious.
 - b. Whether the Dorfman reference in combination with other prior art renders some or all of the subject claims obvious.
 - c. Whether the Apogee reference in combination with other prior art renders some or all of the subject claims obvious.
2. Whether Patent Owner's motions to exclude evidence should be granted.
 - a. Whether the Apogee reference (Ex. 1007) should be excluded.
 - b. Whether the Suetens Declaration (Ex. 1022) should be excluded.
 - c. Whether the Jahns Declaration (Ex. 1023) should be excluded.
 - d. Whether the Supplemental Suetens Declaration (Ex. 1024) should be excluded.
 - e. Whether the Jahns Declaration or the Supplemental Suetens Declaration comprise supplemental evidence or supplemental information.

3. Any arguments made by Petitioners in support of any motion to exclude evidence, or set forth in Petitioner's Request for Oral Argument.

Patent Owner further requests the ability to use audio-visual projection equipment to display demonstrative exhibits via a PowerPoint presentation.

Dated: June 11, 2015

Respectfully submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

/W. Edward Ramage/

W. Edward Ramage, Reg. No. 50,810
(Lead Counsel)

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
211 Commerce Street, Suite 800
Nashville, Tennessee 37201
Tel: (615) 726-5771
Fax: (615) 744-5771
Email: eramage@bakerdonelson.com

L. Clint Crosby, Reg. No. 47,508
(Back-up Counsel)

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
Monarch Plaza, Suite 1600
3414 Peachtree Ave., N.E.
Atlanta, Georgia 30326
Tel: (678) 406-8702
Fax: (678) 406-8802
Email: ccrosby@bakerdonelson.com

*Counsel for Patent Owner CTP
Innovations, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on June 11, 2015, the foregoing Request for Oral Argument was served in its entirety via U.S. Express Mail, postage prepaid, and electronic mail upon the following:

Scott A. McKeown
Michael L. Kiklis
OBLON, SPIVAK, MCCLELLAND,
MAIER & NEUSTADT, LLP
1940 Duke Street
Alexandria, VA 22314

/W. Edward Ramage/
W. Edward Ramage, Reg. No. 50,810