## 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 IPR2014-00790 Patent 6,611,349

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

Filed on behalf of CTP Innovations, LLC

By:

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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. 1008) should be excluded.
  - b. Whether the Suetens Declaration (Ex. 1023) should be excluded.
  - c. Whether the Jahns Declaration (Ex. 1024) should be excluded.
  - d. Whether the Supplemental Suetens Declaration (Ex. 1025) 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.

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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:

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