

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.
(TSMC) and SAMSUNG ELECTRONICS CO., LTD (SAMSUNG),
Petitioners,

v.

DSS TECHNOLOGY MANAGEMENT, INC.
Patent Owner.

Case IPR2014-01030¹
Patent No. 5,652,084

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ Case IPR2014-01493 has been joined with this proceeding.

Patent Owner, DSS Technology Management, Inc., pursuant to 37 C.F.R. § 42.70(a), hereby respectfully requests oral argument on the issues set forth below. Pursuant to the Board's Scheduling Order (Paper 8), oral argument is currently scheduled for August 12, 2015. Patent Owner specifies the following issues to be argued:

- I. Whether Jinbo explicitly discloses the step of patterning the second imaging layer in accordance with a second pattern;
- II. Whether Jinbo inherently discloses the step of patterning the second imaging layer in accordance with a second pattern;
- III. Whether Jinbo anticipates claims 1-8, 12, 15, and 16 under 35 U.S.C. § 102(b);
- IV. Whether claims 10 and 11 are rendered obvious under 35 U.S.C. § 103(a) over Jinbo in view of Matthews;
- V. Any other issues the Board deems necessary for issuing a final written decision.

Date: July 8, 2015

Respectfully submitted,

/andriy lytvyn/

Andriy Lytvyn
Lead Counsel for Patent Owner
USPTO Reg. No. 65,166

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, in accordance with 37 C.F.R. § 42.6(e), a copy of the Patent Owner's Response were served via electronic mail on July 8, 2015, in their entirety upon the following:

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