

Case No. IPR2015-01524
U.S. Patent No. 6,366,130

Attorney Docket No.
ELBRUS-IPR2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.

Petitioner

v.

ELBRUS INTERNATIONAL LIMITED

Patent Owner

Case: IPR2015-01524

U.S. Patent No. 6,366,130

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 15), the Patent Owner requests oral argument, which is currently scheduled for October 18, 2016. The Patent Owner expects to argue the following issues at the oral argument:

- (1) The Petitioner has failed to make a *prima facie* case of obviousness for claims 1, 2, 5, 6 and 9 in the combination Sukegawa in view of Lu because:
 - (a) no differential data bus (second bus) is taught or suggested in the combination; and
 - (b) the combination fails to teach or suggest precharging two separate buses to $V_{pr} = k * V_{dd}$, where k is between 0 and 1.
- (2) The addition of the Wantanabe reference to the combination still fails to make a *prima facie* case of obviousness for claim 3.

The Patent Owner acknowledges that the Petitioner filed a notice that it would not request oral argument; but would appear if the Patent Owner so requested. Hence, both sides will evidently appear.

The Patent Owner also kindly requests that the Board provide a projector and screen for use during oral argument.

Dated: Sept. 12, 2016

Respectfully submitted

/clifford kraft/

Clifford H. Kraft

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CERTIFICATE OF SERVICE

IPR 2015-01524

The undersigned hereby certifies that the foregoing Request for Oral Argument was served on Sept. 12, 2016 by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail upon the following attorneys of record for the Petitioner:

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