UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LAM RESEARCH CORP.,

Petitioner

v.

DANIEL L. FLAMM,

Patent Owner

U.S. Patent No. 6,017,221

Issued: January 5, 2000

Named Inventor: Daniel L. Flamm

Title: PROCESS DEPENDING ON PLASMA DISCHARGES SUSTAINED BY INDUCTIVE COUPLING

Case IPR2015-01767 Patent 6,017,221

PETITIONER'S REQUEST FOR ORAL HEARING

Mail Stop: PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450



Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order entered on February 24, 2016 (Paper No. 11), Petitioner, Lam Research Corp., ("Lam") requests an oral hearing regarding the patentability of all challenged claims of the patent 6,017,221.

In particular, Lam requests (without any intent to waive consideration of any issue not requested) 90 minutes of total argument time to present its arguments on the following issues:

- 1. Whether claims 1 and 5-7 are unpatentable under § 102(b) as anticipated by Lieberman93;
- 2. Whether claims 1 and 5-7 are unpatentable under § 102(b) as anticipated by Lieberman94;
- 3. Whether claims 1 and 5-7 are unpatentable under § 103(a) as obvious over the combination of Lieberman93 and Dible;
- 4. Whether claims 1 and 5-7 are unpatentable under § 103(a) as obvious over the combination of Lieberman94 and Dible;
- 5. Whether claim 4 is unpatentable under § 103(a) as obvious over the combination of Lieberman93 and Collins;
- 6. Whether claim 4 is unpatentable under § 103(a) as obvious over the combination of Lieberman 93, Dible and Collins;
 - 7. Whether claim 4 is unpatentable under § 103(a) as obvious over the



combination of Lieberman94 and Collins;

- 8. Whether claim 4 is unpatentable under § 103(a) as obvious over the combination of Lieberman 94, Dible and Collins;
- 9. Respond to any issues specified by Patent Owner in its request for oral argument;
 - 10. Respond to Patent Owner's presentation on all matters; and
 - 11. Any additional issues on which the Board seeks clarification.

Lam understands that oral argument will be held on Tuesday, October 11, 2016. Lam requests the ability to use audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint display. In accordance with the Trial Practice Guide, 77 Fed. Reg. at 48768, Lam will also contact the Board Trial Division paralegal to discuss this request.



Dated: August 16, 2016.

Respectfully submitted,

By: /Michael Fleming/
Michael Fleming
Michael Fleming (Reg. No. 67,933)
Samuel K. Lu (Reg. No. 40,707)
Morgan Chu (pro hac vice)
Talin Gordnia (pro hac vice)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
Tel.: (310) 277-1010 | Fax: (310) 203-7199
mfleming@irell.com; slu@irell.com;
mchu@irell.com; tgordnia@irell.com
Attorneys for Petitioner Lam Research Corp.



CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. sections 42.6 and 42.105, that a complete copy of the foregoing document is being served, pursuant to the parties' service agreement, via electronic mail (e-mail) upon the following, on the 16th day of August, 2016, the same day as the filing of the above-identified documents in the United States Patent and Trademark Office/Patent Trial and Appeal Board:

Christopher Frerking
Registration No. 42,557
174 Rumford Street
Concord, New Hampshire 03301
chris@ntknet.com

George Summerfield STADHEIM & GREAR, LTD. 400 N. Michigan Avenue, Suite 2200 Chicago, IL 60611 Summerfield@StadheimGrear.com

/Susan M. Langworthy/
Susan M. Langworthy

