

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SONY CORPORATION,  
SAMSUNG ELECTRONICS, CO. LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC., and  
SAMSUNG SEMICONDUCTOR, INC.,  
PETITIONERS

v.

RAYTHEON COMPANY,  
PATENT OWNER

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**Case IPR2016-00209, -00962**

**Patent 5,591,678**

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to the Board's Updated Scheduling Order (Paper No. 21), Patent Owner Raytheon Company hereby respectfully requests oral argument, already scheduled for October 13, 2016.

Pursuant to 37 CFR § 42.70, Patent Owner hereby identifies the following issues to be argued:

1. Whether '678 patent claims 1-18 are unpatentable based on the instituted grounds of unpatentability:

a. '678 Claims 1-4, 6, 7, 10 and 11 are unpatentable under 35 U.S.C. §102(b) as anticipated by Liu;

b. '678 Claims 2-4 and 11 are unpatentable under 35 U.S.C. §103(a) as obvious in view of Liu and Black;

c. '678 Claims 5 and 12-16 are unpatentable under 35 U.S.C. §103(a) as obvious in view of Liu and Riseman;

d. '678 Claim 8 is unpatentable under 35 U.S.C. §103(a) as obvious in view of Liu and Oldham;

e. '678 Claim 10 is unpatentable under 35 U.S.C. §103(a) as obvious in view of Liu and Wen

f. '678 Claim 9 is unpatentable under 35 U.S.C. §103(a) as obvious in view of Liu, Wen and Ying;

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g. '678 Claim 17 is unpatentable under under 35 U.S.C. §103(a) as obvious in view of Liu, Riseman and Kusunoki; and

h. '678 Claim 18 is unpatentable under 35 U.S.C. §103(a) as obvious in view of Liu, Riseman and Oldham.

2. Any issues specified by Petitioner in a Request for Oral Argument.

Patent Owner requests the ability to use audio-visual equipment for demonstrative exhibits such as PowerPoint slides. Patent Owner notes that a portion of the record is subject to confidentiality restrictions, including material and information subject to The International Traffic in Arms Regulations (“ITAR”) found in Title 22 of the Code of Federal Regulations, parts 120 to 130, and that portions of any argument might need to be closed. The panel and parties should discuss the required procedures in a conference call if the panel orders argument.

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Respectfully submitted,

Date: September 8, 2016

/Thomas J. Filarski/

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served on September 8, 2016 in its entirety by filing this document through the Patent Trial and Appeal Board End to End system (PTAB E2E) as well as by delivering a copy via electronic mail to the following:

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Date: September 8, 2016

By: /Thomas J. Filarski/

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