

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.
Petitioner

v.

DSS TECHNOLOGY MANAGEMENT, INC.
Patent Owner

Case IPR. No. **2016-00782**
U.S. Patent No. 6,784,552
Title: STRUCTURE HAVING REDUCED LATERAL SPACER EROSION

**PETITIONER'S REQUEST FOR ORAL ARGUMENT PURSUANT
TO 37 C.F.R. § 42.70(a)**

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

Pursuant to 37 C.F.R. § 42.70(a), Petitioner respectfully requests oral argument on the issues set forth below. Oral argument is presently scheduled for June 20, 2017 (Scheduling Order, Paper 7). Petitioner specifies the following issues to be argued:

- I. Whether Claims 1, 2, and 4-12 of the '552 Patent are unpatentable as being anticipated by Kuesters et al., "Self Aligned Bitline Contact For 4 Mbit dRAM," *Proceedings of the First International Symposium on Ultra Large Scale Integration Science and Technology*, 1987, pp. 640-649 ("Kuesters").
 - a. Argument regarding any issues raised in Patent Owner's Response.
- II. Whether Claim 3 of the '552 Patent is unpatentable as obvious over Kuesters in view of U.S. Patent No. 5,482,894 to Robert H. Havemann ("Havemann").
 - a. Argument regarding any issues raised in Patent Owner's Response.
- III. Whether Claims 1, 2, and 4-7 of the '552 Patent are unpatentable as obvious over Kuesters in view of U.S. Patent No. 4,686,000 to Barbara A. Heath ("Heath").
 - a. Argument regarding any issues raised in Patent Owner's Response.
- IV. Whether Claim 3 of the '552 Patent is unpatentable as obvious over Kuesters in view of Heath and Havemann.

- a. Argument regarding any issues raised in Patent Owner's Response.
- V. Respond to Patent Owner's presentation on all issues.
- VI. Any other issues the Board deems necessary for issuing a final written decision.

Petitioner requests 1.0 hour for the hearing, with each side having 30 minutes for the argument.

Respectfully submitted,



Dated: May 8, 2017

By: _____

Jeremy Jason Lang
Lead Counsel for Petitioner
Registration No. 73,604
Weil, Gotshal & Manges LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065
Telephone: 650-802-3237

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that on the 23rd day of March, 2017, a true and correct copy of PETITIONER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70(a) was served on the counsel of record for the Patent Owner for IPR2016-00782 by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail to the following addresses:

Attorneys of Record

James C. Gumina (gumina@mbhb.com)
Michael D. Clifford (clifford@mbhb.com)
Michael D. Anderson (andersonm@mbhb.com)
McDonnell Boehnen Hulbert & Berghoff LLP
30 South Wacker Drive, Suite 3200
Chicago, Illinois 60606
Tel.: (312) 913-0001
Fax: (312) 913-0002

Dated: May 8, 2017



Jeremy Jason Lang
Lead Counsel for Petitioner
Registration No. 73,604