

Filed on behalf of DSS TECHNOLOGY MANAGEMENT, INC.

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG GROUP  
Petitioner,

v.

DSS TECHNOLOGY MANAGEMENT, INC.,  
Patent Owner.

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Case IPR2016-00782  
Patent 6,784,552

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

## I. Request for Oral Argument

Patent owner DSS Technology Management, Inc., a wholly-owned subsidiary of Document Security Systems, Inc., (“Patent Owner” or “DSS”) respectfully requests oral argument on the issues set forth below pursuant to 37 C.F.R. 42.70(a). Additionally, pursuant to the Board’s scheduling order in this matter, oral argument is set for June 20, 2017, and DSS respectfully requests the opportunity to address and respond to the following issues on that date:

- A. Whether Petitioner has met its burden to prove that claims 1, 2, 4-12 are 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”), as well as any other issues raised by Petitioner in its Petition for Inter Partes Review and/or its Reply to Patent Owner’s Response concerning this issue;
- B. Whether Petitioner has met its burden to prove that claim 3 is obvious over Kuesters and U.S. Patent No. 5,482,894 (“Havemann”), as well as any other issues raised by Petitioner in its Petition for Inter Partes Review and/or its Reply to Patent Owner’s Response concerning this issue;
- C. Whether Petitioner has met its burden to prove that claims 1, 2, 4-7 are obvious over Kuesters and U.S. Patent No. 4,686,000 (“Heath”), as well as any other issues raised by Petitioner in its Petition for Inter Partes Review and/or its Reply to Patent Owner’s Response concerning this issue;
- D. Whether Petitioner has met its burden to prove that claim 3 is obvious over Kuesters, Heath, and Havemann, as well as any other issues raised by Petitioner in its Petition for Inter Partes Review and/or its Reply to Patent Owner’s Response concerning this issue;

- E. Any other issues raised by Petitioner in its Petition for Inter Partes Review and/or its Reply to Patent Owner's Response;
- F. If granted, any arguments or demonstratives presented by Petitioner at oral argument before the Board; and
- G. Any other issues the Board deems necessary to evaluate whether Petitioner has met its burden of proof in this matter.

Additionally, DSS respectfully requests that the Board grant 1.0 hour for the requested oral argument, with each side having 30 minutes to present its arguments before the Board.

Respectfully submitted,

Date: May 15, 2017

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, in accordance with 37 C.F.R. § 42.6(e), the Patent Owner's Request for Oral Argument Pursuant to 37 C.F.R. § 42.70(a) was served on opposing counsel by filing this document through the Patent Review Processing System, as well as by delivering copies of the same via first-class and electronic mail, on May 15, 2017, upon the following:

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Respectfully submitted,

Date: May 15, 2017

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