

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC. and
SAMSUNG ELECTRONICS CO. LTD.

Petitioners,

v.

FASTVDO LLC
Patent Owner.

U.S. Patent No. 5,850,482
Case IPR2016-01179

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's Scheduling Order dated December 16, 2016 (Paper 16), Petitioners Samsung Electronics America, Inc. and Samsung Electronics Co. Ltd. (collectively, "Petitioners"), respectfully request oral argument. Per an email dated June 26, 2017 from the Supervisory Paralegal, such oral argument is presently scheduled for August 24, 2017.

Pursuant to 37 C.F.R. § 42.70(a), Petitioners intend to argue the invalidity of the challenged claims based on the instituted grounds for trial including:

- Claims 1-3, 5, 12-14, 16 and 28 are an obvious combination of Kato's embodiments (35 U.S.C. § 103); and
- Claims 6 and 17 are obvious over Kato in view of Wei (*id.*).

Petitioners are also prepared to argue, as needed, their contention that the challenged claims are obvious based on the grounds stated above under any of the claim constructions relevant to the instituted grounds for trial, including, but not limited to: "code word," "first portion of each code word," and "second portion of each code word," as set forth in:

- Petitioners' Petition and Reply (Paper 3 at, *e.g.*, pgs. 18-21, and Paper 24 at, *e.g.*, pgs. 16-17, respectively);
- the institution Decision (Paper 15 at, *e.g.*, pgs. 8-11); and
- FastVDO's Response (Paper 22 at, *e.g.*, pgs. 12-16);

as well as the construction of FastVDO's proposed additional term, "storage medium," as addressed in:

- FastVDO's Response (Paper 22 at, *e.g.*, pgs. 12-16), and
- Petitioners' Reply (Paper 24 at, *e.g.*, pgs. 16-22).

Finally, Petitioners also intend to argue any motions (if any) pending at the time of the hearing.

Petitioner requests the ability to use audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint display.

July 12, 2017

Respectfully submitted,

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Certificate Of Service In Compliance With 37 C.F.R. § 42.6(e)(4)

The undersigned certifies that a complete copy of **PETITIONERS' REQUEST FOR ORAL ARGUMENT** was served on the correspondence email addresses of record for lead and backup counsel for Patent Owner:

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via email, on July 12, 2017.

A courtesy copy of this Request was also served upon the following litigation counsel for Patent Owner via email:

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