

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY, LTD.,
Petitioner,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case IPR2016-01246¹
Patent 7,126,174 B2

PETITIONER'S REQUEST FOR ORAL ARGUMENT

¹ Case IPR2016-01247 has been consolidated with this proceeding.

Pursuant to 37 C.F.R. § 42.70(a) and in accordance with the Board's Scheduling Order as modified on July 6, 2017 (Paper 28), Petitioner Taiwan Semiconductor Manufacturing Company Limited ("TSMC") respectfully submits this Request for Oral Argument. The Board has scheduled the oral argument in IPR2016-01246 for August 8, 2017 (Paper 9 at 6).

TSMC specifies the following issues to be argued during oral argument:

- Whether claims 1–3, 5–7, 9–12, and 14–18 of U.S. Patent No. 7,126,174 are unpatentable under pre-AIA 35 U.S.C. § 103 as obvious over *Lee* in view of *Noble*;
- Whether claims 1–3, 5–7, 9–12, and 14–18 of U.S. Patent No. 7,126,174 are unpatentable under pre-AIA 35 U.S.C. § 103 as obvious over *Lee* in view of *Ogawa*;
- Whether claims 1, 4, 5, 8–12, 14, and 16 of U.S. Patent No. 7,126,174 are unpatentable under pre-AIA 35 U.S.C. § 103 as obvious over *Lowrey* in view of *Noble*;
- Whether claims 1, 4, 5, 8–12, 14, and 16 of U.S. Patent No. 7,126,174 are unpatentable under pre-AIA 35 U.S.C. § 103 as obvious over *Lowrey* in view of *Ogawa*;
- Any issues identified in Patent Owner's Request for Oral Hearing;
- Any issues raised in either party's Motions to Exclude;

- Any issues raised by Patent Owner in its Sur-Reply (including any issues regarding Dr. Banerjee's deposition testimony); and
- Any other issues the Board deems necessary for issuing a final written decision.

Petitioner requests 60 minutes of argument time for the proposed hearing of consolidated IPR2016-01246 and IPR2016-01247. The reason for this request is that Patent Owner will file a sur-reply, and Petitioner will not have an opportunity to respond, or even to comment on the cross examination, until the hearing. To the extent the Board schedules the hearing to last longer than 120 minutes, Petitioner requests half the length of the hearing be allocated to Petitioner to address these issues.

Finally, Petitioner requests that ten spaces be reserved at the oral hearing to accommodate its counsel and corporate representatives. Petitioner also requests an easel for physical demonstratives, and that two attorneys at Petitioner's counsel's table be allowed to use computers at the hearing (in addition to the counsel making the argument using his or her computer to show electronic demonstratives) to avoid the need for the parties to bring paper copies of the record into the hearing room and to facilitate addressing panel questions.

IPR2016-01246, IPR2016-01247
Patent 7,126,174 B2

Dated: July 12, 2017

Respectfully submitted,

By: /Darren M. Jiron/

Darren M. Jiron

Reg. No. 45,777

Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

Under 37 C.F.R. § 42.6(e), this is to certify that I served a true and correct copy of the **Petitioner's Request for Oral Argument** by electronic mail, on this 12th day of July, 2017, on counsel of record for the Patent Owner as follows:

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Dated: July 12, 2017

By: /Lauren K. Young/
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Litigation Legal Assistant
FINNEGAN, HENDERSON, FARABOW,
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