

Filed on behalf of Godo Kaisha IP Bridge 1

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TAIWAN SEMICONDUCTOR MANUFACTURING COMPANY LIMITED,
and GLOBALFOUNDRIES U.S. INC.,
Petitioners,

v.

GODO KAISHA IP BRIDGE 1,
Patent Owner.

Case Nos. IPR2016-01249¹
U.S. Patent No. 6,538,324

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ GlobalFoundries U.S. Inc.'s motion for joinder in Case IPR2017-00919 was granted.

Pursuant to 37 C.F.R. §42.70(a) and the Scheduling Order dated December 21, 2016 (Paper No. 8), Patent Owner respectfully requests oral argument regarding the patentability of the challenged claims of the '324 patent, and Patent Owner's Contingent Motion To Amend (Paper 16). A substantively similar Request for Oral Argument has also been filed in related Case IPR2016-01264. The Scheduling Order indicates that oral argument (DUE DATE 7) will be held on August 8, 2017. The August 2017 PTAB Public Hearing Schedule confirms that oral argument will be held on August 8, 2017 and indicates that the hearing will be held in Alexandria, VA, Room A, beginning at 9:00 AM (EDT). Patent Owner believes that 1½ hours for each side will be sufficient to cover the issues in both Cases IPR2016-01249 and IPR2016-01264.

Patent Owner requests (without waiving consideration of any issue not listed below) to address the following issues during oral argument:

1. Whether Petitioner has met its burden of proof that the challenged claims of the '324 patent, when properly construed, are unpatentable for obviousness over the combinations of references in the instituted grounds of unpatentability.
2. The issues raised in the Petition, Patent Owner's Preliminary Response, the Decision to Institute, Patent Owner's Response, and Petitioner's Reply to Patent Owner's Response.

3. The issues raised in Patent Owner's Contingent Motion to Amend, Petitioner's Opposition To Patent Owner's Contingent Motion to Amend, and Patent Owner's Reply To Petitioner's Opposition To Patent Owner's Contingent Motion to Amend.

4. Patent Owner's observations on cross-examination.

5. Patent Owner's counter-designations of testimony regarding the deposition of Dr. Harris.

6. Whether evidence should be excluded as identified in Patent Owner's Motion To Exclude Evidence.

7. If filed, any additional issues raised by Patent Owner in any other motion or paper filed by Patent Owner before oral argument.

8. If filed, any additional issues raised by Petitioner in a request for oral argument, in a motion to exclude, or in any other motion or paper filed by Petitioners before oral argument.

9. Any other issues on which the Board seeks clarification.

Patent Owner requests permission to present handouts of demonstrative exhibits and to use audio-visual equipment to display demonstrative exhibits, including a projector. In accordance with Trial Practice Guide, 77 Fed. Reg. 45756, 48768, Patent Owner will also contact the Board Trial Division paralegal to discuss the request.

Dated: July 12, 2017

Respectfully Submitted by:

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*Attorney for Patent Owner,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing:

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

was served by electronic mail on this 12th day of July, 2017, upon Counsel for

Petitioners, as follows:

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