

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES LLC,
Patent Owner

CASE IPR2017-00353
Patent No. 8,983,134

**PATENT OWNER IMAGE PROCESSING TECHNOLOGIES LLC'S
REQUEST FOR ORAL ARGUMENT UNDER 37 C.F.R. § 42.70**

Pursuant to the Scheduling Order (Paper 13) for case no. IPR2017-00353 and the parties' Joint Stipulation to Modify Schedule (Paper 20), Image Processing Technologies LLC ("Patent Owner") respectfully requests oral argument. DUE DATE 7 (Oral argument) is currently scheduled for February 21, 2018. Petitioner has previously requested oral argument for IPR2017-00336 ('293 Patent), for which DUE DATE 7 is also February 21, 2018. (IPR2017-00336, Paper 25.)

Pursuant to 37 C.F.R § 42.70(a), Image Processing intends to argue the following issues:

1. Any issues raised by Patent Owner in IPR2017-00353, including but not limited to issues of record in the Patent Owner response (Paper 17) and in cross-examination and redirect of Dr. Alan Bovik (Exhibit 1011), including the patentability of claims 1 and 2 of U.S. Patent No. 8,983,134 and the construction of the claim language of claim 1 "wherein forming the at least one histogram further comprises determining X minima and maxima and Y minima and maxima of boundaries of the target".
2. Rebuttal to issues raised by Petitioner.
3. To the extent necessary, any motion to exclude or other motion filed by Petitioner.

Image Processing requests 30 minutes per side for oral argument for IPR2017-00353. Image Processing also requests the ability to use audio/visual equipment to display demonstrative exhibits, including the use of an Elmo/digital projector and screen for projection of electronic and paper materials.

Dated: January 25, 2018

/s/ Chris J. Coulson

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on January 25, 2018, the foregoing was served via electronic mail upon the following counsel of record for the Petitioner:

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