

**UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

KAWASAKI RAIL CAR, INC.  
Petitioner,

v.

SCOTT BLAIR,  
Patent Owner.

---

Case No. IPR2017-01036

Patent No. 6,700,602

Issue Date: March 2, 2004

Title: Subway TV Media System

---

**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

---

Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order (Paper No. 11), Petitioner, Kawasaki Rail Car Inc., respectfully requests oral argument, currently scheduled for June 5, 2018. *See* Scheduling Order of September 12, 2017, Paper No. 11.

Petitioner requests that it be permitted to address the following issues at the hearing (without waiving consideration of any issue not listed below):

1. The unpatentability of claims 5, 7-9 and 11-29 of U.S. Patent No. 6,700,602 as obvious under 35 U.S.C. § 103 in view of Namikawa, Sasao, Amano, Maekawa, Yamada, Sedighzadeh and Schwenkler;
2. The arguments and evidence in Petitioner's Petition, Petitioner's Reply, and the supporting declarations of Petitioner's expert, Lowell Malo, including Petitioner's responses to Patent Owner's arguments and evidence in the Patent Owner Response and the supporting declarations of Patent Owner's expert, Joseph Zicherman.
3. Patent Owner's motion to exclude evidence and Petitioner's opposition and supplemental evidence in response to Patent Owner's motion (if Patent Owner files a motion to exclude);
4. Patent Owner's observations on the April 24, 2018 deposition of Lowell Malo and Petitioner's response to those observations (if Patent Owner files observations);

5. Petitioner's rebuttal to Patent Owner's presentation on all matters; and
6. Any additional issues on which the Board seeks clarification.

Petitioner requests no more than one hour per side of oral argument time.

Petitioner also respectfully requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen that may be connected to a laptop computer of Petitioner's counsel. The laptop computer will have a VGA-type connector. In addition, Petitioner requests that an ELMO-type projector be made available for use.

Dated: April 30, 2018

Respectfully submitted,

*/s/ Mark A. Chapman*

---

Sheila Mortazavi (Reg. No. 43,343)

Lead Counsel

Mark A. Chapman (admitted *pro hac vice*)

Backup Counsel

Zaed M. Billah (Reg. No. 71,418)

Backup Counsel

Armin Ghiam (Reg. No. 72,717)

Backup Counsel

HUNTON ANDREWS KURTH LLP

One Broadway

New York, NY 10004

Telephone: (212) 425-7200

Fax: (212) 425-5288

Email:

SMortazavi@HuntonAK.com

MChapman@HuntonAK.com

ZBillah@HuntonAK.com

AGhiam@HuntonAK.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 30, 2018, a complete and entire copy of this **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served via e-mail on the following:

Jennifer Meredith  
[jmeredith@meredithkeyhani.com](mailto:jmeredith@meredithkeyhani.com)  
205 Main Street  
East Aurora, New York 14052  
Tel: (212) 760-0098  
Fax: (212) 202-3819

Respectfully submitted,

/s/ Armin Ghiam  
Armin Ghiam  
HUNTON ANDREWS KURTH LLP  
One Broadway  
New York, NY 10004  
Telephone: (212) 425-7200