

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 No. IPR2017-01218
U.S. Patent No. 8,983,134

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Petitioner Samsung Electronics Co., Ltd. and Samsung Electronics America Inc. (collectively “Petitioner”) respectfully requests oral argument in connection with IPR2017-01218 for U.S. Patent No. 8,983,134 (“the ’134 Patent”). Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- Grounds for which *inter partes* review was instituted for the ’134 Patent and any issue raised in the Board’s Institution Decision, including the Board’s Supplemental Institution Decision entered May 3, 2018 (Paper No. 25), instituting review on all claims and grounds presented in the Petition;
- Any issue addressed in Petitioner’s papers, including but not limited to the Petition, Petitioner’s Reply Brief and the Supplemental Reply Brief to be filed on May 31, 2018, as ordered in Paper 26;
- Rebuttal to Patent Owner’s presentation on all issues, including the issues identified above and any issues raised in Patent Owner’s Response and exhibits cited therein.
- Any issues raised by the Board or Patent Owner at oral argument;
- Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and
- Any other issues that the Board deems necessary for issuing a final written decision.

Pursuant to the Scheduling Order (Paper 12 at 4, 7) the oral hearing for this case IPR2017-01218 is currently scheduled for June 29, 2018. Petitioner requests 45 minutes or half of the time that the Board determines is appropriate for oral argument and expressly reserves the right to use a portion of its time for rebuttal. Petitioner additionally requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a monitor or projector to be connected to a laptop, a screen, and an ELMO for displaying documents of record.

Date: May 18, 2018

Respectfully submitted,

/s/ John Kappos

John Kappos (Reg. No. 37,861)
Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies pursuant to 37 C.F.R. § 42.6(e) and § 42.105 that on May 18, 2018, a true and correct copy of **PETITIONER’S REQUEST FOR ORAL ARGUMENT** was served via express mail on the Patent Owner at the following correspondence address of record:

Michael N. Zachary (pro hac vice)
ANDREWS KURTH KENYON LLP
1801 Page Mill Road, Suite 210
Palo Alto, CA 94304
MichaelZachary@AndrewsKurthKenyon.com

Christopher J. Coulson (Reg. No. 61,771)
ANDREWS KURTH KENYON LLP
One Broadway
New York, NY 10004
ChrisCoulson@AndrewsKurthKenyon.com

Lauren N. Robinson (Reg. No. 74,404)
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
lrobinson@bdiplaw.com

Craig Y. Allison (Reg. No. 38,067)
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
callison@bdiplaw.com

Respectfully submitted,

/s/ John Kappos

John Kappos (Reg. No. 37,861)
O’Melveny & Myers LLP
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660
Telephone: (949) 760-9600

Attorney for Petitioner