Paper	No.	
-------	-----	--

## UNITED STATES PATENT AND TRADEMARK OFFICE

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION Petitioner,

v.

FUJIFILM CORPORATION Patent Owner.

Case No. IPR2018-00876 Patent No. 6,462,905 B1

\_\_\_\_

## PETITIONER'S REQUEST FOR ORAL ARGUMENT



Petitioner Sony Corporation, by and through its attorneys, respectfully requests oral argument, currently scheduled for June 21, 2019. Given the number of grounds and issues that differ between grounds, Petitioner requests 45 minutes to present its arguments. Petitioner requests the ability to reserve a portion of its total time for presenting rebuttal arguments after Patent Owner's presentation.

Pursuant to 37 C.F.R § 42.70, and without intending to waive any issue not specifically identified, Petitioner identifies the following issues to be argued:

- 1. Obviousness of claims 1–2 under 35 U.S.C. § 103 in view of the combined teachings of McAllister-I in view of Laverriere;
- 2. Anticipation of claim 3 under 35 U.S.C. § 102 in view of McAllister-I;
- 3. Obviousness of claim 3 under 35 U.S.C. § 103 in view of the combined teachings of McAllister-I in view of Laverriere;
- 4. Anticipation of claim 3 under 35 U.S.C. § 102 in view of Mizutani;
- 5. Obviousness of claim 3 under 35 U.S.C. § 103 in view of Mizutani;
- 6. Any issues specified by Patent Owner in its request for Oral Argument;
- 7. Any other issues raised in papers yet to be filed, such as Motions to Exclude;
- 8. Any other issues the Board deems necessary for issuing a final written decision.



Dated: 5/21/2019

Respectfully submitted, *Sony Corporation* 

By /s/ Nathan R. Speed

Boston, MA 02210-2206

Richard F. Giunta, Reg. No. 36,149
Michael H. Rader, Reg. No. 52,146
Randy J. Pritzker, Reg. No. 35,968
Nathan R. Speed (*pro hac* vice)
WOLF GREENFIELD & SACKS, P.C.
600 Atlantic Ave.

Tel: 617-646-8000/Fax: 617-646-8646



## CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

I certify that on May 21, 2019, I will cause a copy of the foregoing document, including any exhibits or appendices referred to therein, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Eliot D. Williams <u>eliot.williams@bakerbotts.com</u>

Robert C. Scheinfeld <u>robert.scheinfeld@bakerbotts.com</u>

Robert L. Maier <u>robert.maier@bakerbotts.com</u>

Jennifer Tempesta <u>jennifer.tempesta@bakerbotts.com</u>

Margaret M. Welsh <u>margaret.welsh@bakerbotts.com</u>

Daniel Rabinowitz <u>daniel.rabinowitz@bakerbotts.com</u>

Katharine M. Burke <u>katharine.burke@bakerbotts.com</u>

Date: May 21, 2019 /Lisa Woodbury/

Lisa Woodbury

Paralegal

WOLF GREENFIELD & SACKS, P.C.

