

Filed: July 26, 2019

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, ZTE (USA), INC., SAMSUNG ELECTRONICS CO., LTD.,
LG ELECTRONICS INC., HUAWEI DEVICE USA, INC.,
HUAWEI DEVICE CO. LTD., HUAWEI TECHNOLOGIES CO. LTD.,
HUAWEI DEVICE (DONGGUAN) CO. LTD.,
HUAWEI INVESTMENT & HOLDING CO. LTD.,
HUAWEI TECH. INVESTMENT CO. LTD., and
HUAWEI DEVICE (HONG KONG) CO. LTD.,
Petitioner

v.

CYWEE GROUP LTD.
Patent Owner

Case IPR2018-01257

Patent No. 8,552,978

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO
37 C.F.R. § 42.70(a)**

Patent Owner, CyWee Group Ltd., by and through its attorneys, respectfully requests oral argument, currently scheduled for September 13, 2019. Patent Owner requests that oral argument for this IPR be combined with that for IPR2018-01258 regarding U.S. Patent 8,441,438 for which a separate request for oral argument is being concurrently submitted. For a combined hearing, Patent owner requests a total of 100 minutes to present its arguments, as well as to reserve a portion of its total time for presenting rebuttal arguments after Petitioner's presentation. Alternatively, Patent Owner requests a total of 60 minutes to present its arguments for a hearing for the current IPR alone.

Pursuant to 37 C.F.R § 42.70, and without intending to waive any issue not specifically identified, Patent Owner specifies the following issues to be argued regarding the present IPR:

1. That claims 10 and 12 of U.S. Patent 8,552,978 are not obvious under 35 U.S.C. § 103 over Zhang, Exhibit 1005, in view of Bachmann, Exhibit 1004;
2. That claims 10 and 12 of U.S. Patent 8,552,978 are not obvious under 35 U.S.C. § 103 over Liberty, Exhibit 1005, in view of Bachmann, Exhibit 1004;
3. Alternatively, that Petitioner's asserted grounds are overcome by Patent Owner's contingent amendments to claims 10 and 12 as set forth in Patent

Owner's Motion to Amend, that Patent Owner's proposed contingent amendments are fully supported by the original application, that Patent Owner's proposed amended claims are entitled to the same priority date as the '438 Patent, and that Patent Owner's proposed contingent amended claims are not obvious under 35 U.S.C. § 103 over Withanawasam, Exhibit 1017, in view of Bachmann, Exhibit 1004;

4. Whether Bachmann, Exhibit 1004, can properly be considered prior art;
5. Whether Withanawasam, Exhibit 1017, can properly be considered prior art;
6. Proper claim construction for claim limitations raised in Patent Owner Response and Patent Owner's Motion to Amend;
7. Petitioner's failure to disclose all Real Parties in Interest and/or Privies as required by 35 U.S.C. §§ 315 and the requirement that the IPR be dismissed because one or more of the undisclosed parties were time-barred at the time that Petitioner filed its petition;
8. Any issue identified in Petitioner's Request for Oral Argument;
9. Any other issues raised in papers yet to be filed, such as Motions to Exclude;
and
10. Any other issues the Board deems necessary to consider for issuing a Final Written Decision.

Patent Owner requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector to be connected to a laptop and a screen for displaying documents.

Respectfully submitted,

Date: July 26, 2019

/Jay P. Kesan/ (Reg. No. 37488)

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Counsel for Patent Owner

Cywee Group Ltd.

Certificate of Service

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on the date indicated below, a complete and entire copy of this submission, including the exhibits hereto, was provided by email to Petitioners' counsel via email, as agreed to by Petitioners' Service Information in the Petition submissions, by serving the email addresses of record as follows:

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