

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.

Petitioner

v.

UNILOC LUXEMBOURG, S.A.¹

Patent Owner

IPR2018-01664

PATENT 8,872,646

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ The owner of this patent is Uniloc 2017 LLC.

Patent Owner Uniloc 2017 LLC hereby requests oral argument in accordance with 37 C.F.R. §42.70 and pursuant to the Scheduling Order (Paper 8) entered March 8, 2019. In that Patent Owner's counsel is located in the Dallas, Texas area, Patent Owner respectfully requests that the Board conduct the hearing at the Texas Regional Office in Dallas, Texas.

Patent Owner proposes no more than thirty (30) minutes per side. Patent Owner also requests permission to use audiovisual display equipment to present demonstratives, including a projector and screen for computer-generated slides, and a document camera/projector. Patent Owner expects to have two people at the hearing.

Issues to be argued include:

1. Any issues pertaining to the grounds on which this IPR was instituted. This may include, for example, the level of ordinary skill in the art, claim construction, the absence of elements in the prior art, and reasons/motivations to combine references.
2. Any issues specified in the Petition.
3. Any issues specified in Patent Owner's Motion to Amend.
4. Any issues specified in Petitioner's Opposition.
5. Any issues specified in Patent Owner's Reply.
6. Any issues specified in Petitioner's Sur-Reply in Opposition to the

Motion to Amend.

7. Any issues otherwise raised by the Board.

Date: November 12, 2019

Respectfully submitted,

/s/ Brett A. Mangrum

Brett A. Mangrum

brett@etheridgelaw.com

Reg. No. 64,783

Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e), the undersigned certifies that an electronic copy of the foregoing was served, along with any accompanying exhibits not previously served, via the PTAB E2E system and/or via email to Petitioner's counsel at the following addresses identified in the Petition's consent to electronic service:

Lead Counsel	Naveen Modi	naveenmodi@paulhastings.com PH-Samsung-Uniloc-IPR@paulhastings.com
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