

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

**LG ELECTRONICS INC.**

**Petitioner**

**v.**

**IMMERVISION, INC.**

**Patent Owner**

---

**Case IPR2020-00195**

**Patent No. 6,844,990**

---

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**  
**PURSUANT TO 37 CFR § 42.70**

Pursuant to 37 C.F.R. § 42.70 and the Board's May 26, 2020 Scheduling Order (Paper No. 7) ("Scheduling Order"), Patent Owner ImmerVision, Inc. ("Patent Owner") hereby respectfully requests oral argument on the issues set forth below in connection with this proceeding (IPR2020-00195). As set forth in the Scheduling Order, oral argument is currently scheduled to take place on February 8, 2021. Patent Owner is aware of the USPTO's March 13, 2020 notice that all oral hearings will be conducted remotely until further notice (<https://www.uspto.gov/about-us/news-updates/uspto-update-person-meetings>). Accordingly, to the extent all hearings continue to be conducted remotely as of February 8, 2021, Patent Owner is willing and able to participate in a remote hearing.

Patent Owner respectfully requests that each side be given thirty (30) minutes to present its arguments. Patent Owner further respectfully requests that the argument for IPR2020-00179, also scheduled for February 8, 2021, be consolidated with the oral argument in IPR2020-00195, given the substantial similarity in disputed issues between the proceedings. Patent Owner specifies at least the following issues to be argued:

(1) Whether the Tada reference contains an error readily apparent to one skilled in the art such that the person skilled in the art would disregard any alleged teaching of a lens modeled using only the data from Tada's Table 5;

(2) Whether Petitioner has failed to demonstrate that claim 21 of the '990 patent would have been obvious over Tada alone (Ground 1);

(3) Whether Petitioner has failed to demonstrate that claim 21 of the '990 patent would have been obvious over Tada in view of Nagaoka (Ground 2);

(4) Whether Petitioner has failed to demonstrate that claim 21 of the '990 patent would have been obvious over Tada in view of Baker (Ground 3); and

(5) Any additional issues on which the Board seeks clarification.

Patent Owner respectfully requests the ability to use audio-visual equipment to display exhibits.

Case No.: IPR2020-00195

Docket No.: 688266-72IPR

Date: December 28, 2020

Respectfully submitted,

By: /Stephen E. Murray/  
Stephen E. Murray, Reg. No. 63,206  
Keith A. Jones, Reg. No. 67,781  
**PANITCH SCHWARZE BELISARIO & NADEL LLP**  
Two Commerce Square  
2001 Market Street, Suite 2800  
Philadelphia, Pennsylvania 19103  
(215) 965-1330  
(215) 965-1331 (Fax)  
[smurray@panitchlaw.com](mailto:smurray@panitchlaw.com) (E-Mail)  
[kjones@panitchlaw.com](mailto:kjones@panitchlaw.com) (E-Mail)

John D. Simmons, Reg. No. 52,225  
Dennis J. Butler, Reg. No. 51,519  
**PANITCH SCHWARZE BELISARIO & NADEL LLP**  
Wells Fargo Tower  
2200 Concord Pike, Suite 201  
Wilmington, DE 19803  
(302) 394-6030  
(302) 394-6031 (Fax)  
[jsimmons@panitchlaw.com](mailto:jsimmons@panitchlaw.com) (E-mail)  
[dbutler@panitchlaw.com](mailto:dbutler@panitchlaw.com) (E-mail)

**CERTIFICATE OF SERVICE UNDER 37 CFR § 42.6(e)**

I hereby certify that a true copy of the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 CFR § 42.70 has been served in its entirety this 28<sup>th</sup> day of December 2020, by electronic mail on Petitioner's lead and back-up counsel, as follows:

Dion M. Bregman  
Bradford A. Cangro  
Collin W. Park  
Andrew V. Devkar  
Jeremy D. Peterson  
Morgan, Lewis & Bockius LLP  
1400 Page Mill Road  
Palo Alto, CA, 94304  
[LGE-ImmerVision-IPRs@morganlewis.com](mailto:LGE-ImmerVision-IPRs@morganlewis.com)

/Stephen E. Murray/  
Stephen E. Murray  
Registration No. 63,206  
Attorney for ImmerVision, Inc.