

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION and XILINX, INC.¹,
Petitioners

v.

FG SRC LLC,
Patent Owner

Case IPR2020-01449

Patent No. 7,149,867 B2

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

¹ Xilinx, Inc. filed a petition and motion for joinder in IPR2021-00633, which were granted and, therefore, has been joined as petitioner in this proceeding.

Patent Owner, FG SRC LLC, by and through its attorneys, respectfully requests oral argument, currently scheduled for January 6, 2022. Patent Owner requests a total of 60 minutes to present its arguments, as well as to reserve a portion of its total time for presenting rebuttal arguments after Petitioners' presentation.

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 1, 2, 4-8, and 13-19 of U.S. Patent No. 7,149,867 are not obvious under 35 U.S.C. § 103 over Zhang, Exhibit 1003, in view of Gupta, Exhibit 1004;
2. That claims 3 and 9-12 of U.S. Patent No. 7,149,867 are not obvious under 35 U.S.C. § 103 over Zhang, Exhibit 1003, including Gupta, Exhibit 1004, in view of Chien, Exhibit 1005;
3. That neither Zhang, Exhibit 1003, Gupta, Exhibit 1004, nor Chien, Exhibit 1005, qualify as printed publications within the meaning of 35 U.S.C. § 102;
4. That revised amended claims 20-38 are patentable and not obvious or anticipated;

5. Proper claim construction for claim limitations raised in Patent Owner's Response, Patent Owner's Motion to Amend, and Patent Owner's Revised Motion to Amend;
6. Any issue identified in Petitioners' Request for Oral Argument;
7. Any other issues raised in papers yet to be filed, such as Motions to Exclude; and
8. 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: October 20, 2021

/Jay P. Kesan/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.70(a), the undersigned certifies that a complete copy of *Patent Owner's Request for Oral Argument* was filed electronically through the Patent Trial and Appeal Board's PTAB E2E System and provided, via electronic service, to the Petitioner by serving the correspondence address of record as follows:

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