

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners,

v.

GUI GLOBAL PRODUCTS, LTD.,
Patent Owner.

Case IPR2021-00338
Patent 10,589,320

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board’s July 2, 2021, Scheduling Order (Paper 12), Patent Owner, GUI Global Products, Ltd. (“Patent Owner”), requests the opportunity to present oral argument in this matter. The oral argument is scheduled to be held on April 12, 2022. Paper 12 at 9.

Related IPR2021-00335 re U.S. Patent 10,259,020, IPR2021-00336 re U.S. Patent 10,259,021, and IPR2021-00337 re U.S. Patent 10,562,077 are currently pending between the same parties as are involved in this proceeding and Patent Owner is concurrently requesting oral argument in these related proceedings, which also have a hearing date scheduled for April 12, 2022. The issues presented for review in IPRs 2021-00335, 2021-00336, and 2021-00337 are substantially similar as those presented for review in this proceeding. Therefore, Patent Owner requests that a single, consolidated hearing for all of these proceedings be conducted for convenience of the parties and the Board. Patent Owner requests a total of 90 minutes per side argument time for the single, consolidated hearing. Alternatively, if the Board does not desire a single, consolidated hearing, then Patent Owner requests a total of 60 minutes per side for the hearing on this IPR 2021-00338.

Issues to be addressed during oral argument:

1. Whether Petitioner has met its burden of proving that Claims 1-8 of the ‘320 patent are unpatentable as obvious over Kim.

2. Whether Petitioner has met its burden of proving that Claim 11 of the '320 patent is unpatentable as obvious over Kim and Koh.
3. Whether Petitioner has met its burden of proving that Claims 9-10 and 12-13 of the '320 patent are unpatentable as obvious over Kim and Lee.
4. Any other issues raised in Petitioner's Petition.
5. Any issues raised in Patent Owner's Response.
6. Whether any matters asserted in Petitioner's Reply that were not asserted in Petitioner's Petition should be considered by the Board. Subject to the foregoing, any issues raised in Patent Owner's Sur-Reply.
7. Patent Owner's and Petitioner's Motions to Exclude Evidence, if any;
8. Rebuttal of any arguments made by Petitioner;
9. Any additional issues on which the Board seeks clarification; and
10. Response to any issues Petitioner raises in its Request for Oral Argument.

Patent Owner respectfully reserves the right to supplement and/or amend the foregoing statement of issues to the extent the Rules permit.

Petitioner is the party with the burden of proof and will present first at the oral hearing. Patent Owner will address any issues raised by Petitioner, or questions raised by the Board during presentation.

Patent Owner understands it is likely that oral argument may be conducted remotely by video or telephone in view of the ongoing COVID-19 coronavirus pandemic. In the event that oral argument is conducted in-person, Patent Owner requests the use of audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen.

Date: March 1, 2022

Respectfully submitted,

/ John J. Edmonds /
John J. Edmonds, Reg. No. 56,184
ad Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

was served on March 1, 2022, by filing this document through the PTAB E2E System as well as by delivering a copy via email directed to the attorneys of record for the Petitioner at the following addresses:

Ali.Sharifahmadian@arnoldporter.com
Jin.Park@arnoldporter.com
Chris.Moulder@arnoldporter.com;
Mark.Patrick@arnoldporter.com
xSamsungGUIIPRAP@arnoldporter.com

The parties have agreed to electronic service in this proceeding.

Date: March 1, 2022

Respectfully submitted,

/ John J. Edmonds /

John J. Edmonds, Reg. No. 56,184
ad Counsel for Patent Owner