

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCT MOBILE (US), INC.; TCT MOBILE (US) HOLDINGS, INC.;
HUIZHOU TCL MOBILE COMMUNICATION CO. LTD.; AND
TCL COMMUNICATION, INC.,
Petitioner,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,
Patent Owner.

Case IPR2021-00599
Patent No. 7,834,586

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Fundamental Innovation Systems International LLC (“Patent Owner”) respectfully requests an oral hearing in this matter. Patent Owner requests each side be allocated 60 minutes of total argument time to address the following issues:

1. The patentability of challenged claims 1-2 and 8-9 of the U.S. Pat. No. 7,834,586 over all grounds asserted in the Petition;
2. Respond to any issues raised by Petitioner in its request for oral argument or otherwise presented by the Petitioner;
3. Any other relevant issue raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and,
4. Any additional issues on which the Board seeks clarification.

Patent Owner understands that oral argument will be held on June 7, 2022 per Scheduling Order, Paper 19.

Patent Owner requests the ability to use audio/visual equipment to display demonstrative exhibits, including the use of a computer, projector and screen for a PowerPoint display. In accordance with the Trial Practice Guide, 77 Fed. Reg. at 48768, Patent Owner will contact the Board Trial Division paralegal to discuss this request.

IPR2021-00599
Patent No. 7,834,586

Dated: April 18, 2022

Respectfully submitted,

/Hong Zhong/

H. Annita Zhong (Reg. No. 66,530)

Jason Sheasby (*pro hac vice*)

Irell & Manella LLP

1800 Avenue of the Stars, Suite 900

Los Angeles, CA 90067

Tel: (310) 277-1010

Fax: (310) 203-7199

Email: HZhong@irell.com

Email: JSheasby@irell.com

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on April 18, 2022, a copy of the foregoing document **PATENT OWNER'S REQUEST FOR ORAL HEARING** has been served in its entirety via e-mail, as agreed, on counsel of record for petitioner at the following address:

ORRICK, HERRINGTON & SUTCLIFFE, LLP

Jeffrey Johnson, Reg. No. 53,078
3J6PTABDocket@orrick.com

Robert J. Benson
R75PTABDocket@orrick.com

Jeremy Jason Lang
PTABDocketJL2@Orrick.com

TCL-FISI_OHS@orrick.com

/Susan M. Langworthy/
Susan M. Langworthy