

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.,
Petitioners

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,
Patent Owner

U.S. Patent No. 7,834,586
Issue Date: November 16, 2010
Title: MULTIFUNCTIONAL CHARGER SYSTEM AND METHOD
Case No. IPR2021-00599

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
PO Box 1450
Alexandria, Virginia 22313-1450

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order dated August 7, 2021 (Paper No. 9), Petitioners TCT Mobile (US), Inc.; TCT Mobile (US) Holdings, Inc.; Huizhou TCL Mobile Communication Co. Ltd.; and TCL Communication, Inc. (“Petitioners”) request Oral Argument on issues related to the patentability of claims 1-2 and 8-9 of U.S. Patent No. 7,834,586.

Petitioners request to present arguments on the following issues:

- All grounds on which trial was instituted, including all issues raised by the parties’ papers;
- Any issue raised by either party in a motion to exclude (if any), objections to demonstrative exhibits (if any), or any other motion or paper filed by either party before oral argument;
- Rebuttal to any issue raised by either party in its presentation at the oral argument; and
- Any additional issue on which the Board seeks clarification.

In the Scheduling Order dated August 27, 2021 (Paper No. 9), the Board scheduled Oral Argument for June 7, 2022. Petitioners respectfully propose that they be provided 45 minutes of argument time, inclusive of any rebuttal time Petitioners wish to reserve at the hearing.

Petitioners also respectfully request the ability to use audio-visual equipment to display demonstratives and exhibits, including the use of a computer, a projector, an overhead projector (“Elmo”), and a screen.

To the extent the Oral Argument is conducted remotely by video or telephone, Petitioners respectfully request permission to file their demonstratives with the Board and to refer to their demonstratives during argument.

Dated: April 18, 2022

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /Jeffrey Johnson/

Jeffrey Johnson, Reg. No. 53,078
Email: 3J6PTABDocket@orrick.com
609 Main Street, 40th Floor
Houston, TX 77002-3106
Main: (713) 658-6400
Fax: (713) 658-6401

Robert J. Benson (to be admitted *pro hac vice*)
Email: R75PTABDocket@orrick.com
2050 Main Street, Suite 1100
Irvine, CA 92614-8255
Main: (949) 567-6700
Fax: (949) 567-6710

Jeremy Jason Lang
USPTO Reg. No. 73,604
Email: PTABDocketJL2@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE,
LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
Main: (650) 614-7400
Fax: (650) 614-7401

Attorneys for Petitioners

CERTIFICATION OF SERVICE ON PATENT OWNER

The undersigned certifies that on April 18, 2022, a copy of the foregoing was served in its entirety by filing through the Patent Trial and Appeal Board End to End System, as well as via electronic mail, upon the following attorneys of record for the Patent Owner:

Hong Annita Zhong	hzhong@irell.com
Jason Sheasby	jsheasby@irell.com
1800 Avenue of the Stars, Suite 900	FundamentalIPRs@irell.com
Los Angeles, California 90067	

*Attorneys for Patent Owner
Fundamental Innovation Systems International LLC*

/Karen Johnson/
Karen Johnson