

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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MICRON TECHNOLOGY, INC.,  
Petitioner,

v.

VERVAIN, LLC,  
Patent Owner

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Case No.: IPR2021-01550  
U.S. Patent No. 10,950,300  
Original Issue Date: March 16, 2021

Title: LIFETIME MIXED LEVEL NON-VOLATILE MEMORY SYSTEM

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order dated April 11, 2022 (Paper No. 12), Petitioner Micron Technology, Inc. (“Petitioner”) requests Oral Argument on issues related to the patentability of claims 1-12 of U.S. Patent No. 10,950,300.

Petitioner requests 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.

There are four IPR proceedings covering four patents that all share a common specification:

1. IPR2021-01547 (298 Patent);
2. IPR2021-01548 (385 Patent);
3. IPR2021-01549 (240 Patent); and
4. IPR2021-01550 (300 Patent) (*which this Request covers*).

Given common Patent Owner arguments among the four proceedings, and subject to any preferences of the Board, Petitioner believes that it would be most efficient for arguments to proceed as follows:

1. Combine oral argument for IPR2021-01547 (298 Patent) and IPR2021-01548 (385 Patent) into a single, consolidated hearing. Petitioner respectfully proposes that each party be given 60 minutes of argument time for the consolidated hearing, inclusive of any rebuttal time.
2. Following this argument, the parties will argue IPR2021-01549 (240 Patent). Petitioner respectfully proposes that each party be given 45 minutes of argument time for the hearing, inclusive of any rebuttal time.
3. Following this argument, the parties will argue IPR2021-01550 (300 Patent). Petitioner respectfully proposes that each party be given 45 minutes of argument time for the hearing, inclusive of any rebuttal time.

Petitioner also respectfully requests the ability to use audio-visual equipment to display demonstrative exhibits, including use of a computer, a projector, a digital projector / document camera (“Elmo”), and a screen.

To the extent the Oral Argument is conducted by video or telephone, Petitioner respectfully requests permission to file its demonstratives with the Board and to refer to its demonstratives during argument.

Dated: November 23, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP



By: \_\_\_\_\_  
Jeremy Jason Lang  
Lead Counsel for Petitioner  
Reg. No. 73,064  
1000 Marsh Road  
Menlo Park, CA 94025-1015  
T: (650) 614-7400  
F: (650) 614-7401  
Email: PTABDocketJL2@orrick.com  
*Attorney for Petitioner*

## CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on the Patent Owner as detailed below.

*Date of Service*            November 23, 2022

*Manner of Service*        Electronic Mail

*Documents Served*        PETITIONER'S REQUEST FOR ORAL ARGUMENT

*Persons Served*            Patent Owner's Counsel of Record

Alan Whitehurst  
[awhitehurst@mckoolsmith.com](mailto:awhitehurst@mckoolsmith.com)  
Christopher P. McNett  
[cmcnett@mckoolsmith.com](mailto:cmcnett@mckoolsmith.com)  
Arvind Jairam  
[ajairam@mckoolsmith.com](mailto:ajairam@mckoolsmith.com)  
MCKOOL SMITH, P.C.  
1999 K St. NW, Suite 600  
Washington, DC 20006

James E. Quigley  
Reg. No. 78,596  
[jquigley@mckoolsmith.com](mailto:jquigley@mckoolsmith.com)  
MCKOOL SMITH, P.C.  
303 Colorado Street, Suite 2100  
Austin, Texas 78701

Copy: [Vervain-Mic-MS@McKoolSmith.com](mailto:Vervain-Mic-MS@McKoolSmith.com)

*/Karen Johnson/*

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Karen Johnson