

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. and DELL TECHNOLOGIES INC.
Petitioners,

v.

MYPAQ HOLDINGS LTD.
Patent Owner.

Case IPR2022-00311
U.S. Patent No. 8,477,514

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's May 23, 2022, Scheduling Order (Paper 11), MyPAQ Holdings Ltd. ("Patent Owner") respectfully requests oral argument, currently scheduled for February 23 and 24, 2023. Patent Owner requests a remote hearing, although Patent Owner can conduct an in-person hearing if that is more convenient for the Board.

Reservation Of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund., Ltd. et al. v. VirnetX Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.")

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, anticipation, obviousness, motivation to combine, and reasonable expectation of success;
- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and

- Any other issues that the Board deems necessary for issuing a Final Written Decision, including any questions, rebuttals, or arguments that may arise during the oral argument.

The Board's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 60 minutes of total argument time per side. Patent Owner believes that this is a sufficient amount of time to discuss all issues in this case. Patent Owner requests this IPR be argued sequentially with IPR2022-0312 as the patents in both are related and there are overlapping issues and prior art in both proceedings.

Equipment: Patent Owner requests teleconference software (e.g., Zoom, Teams, etc.) with the ability to display possible demonstratives and exhibits during the remote hearing.

Respectfully submitted,

/Stephen McBride/
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Counsel for Patent Owner

Date: January 6, 2023

CERTIFICATE OF SERVICE

I hereby certify that on January 6, 2023, I caused a true and correct copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** to be served on the following counsel of record for Petitioner by electronic mail to the following addresses:

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By: /Stephen McBride/
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