

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SAMSUNG ELECTRONICS CO., LTD., DELL TECHNOLOGIES INC.,  
and ANKER INNOVATIONS LTD.,<sup>1</sup>

Petitioner,

v.

MYPAQ HOLDINGS LTD.,

Patent Owner.

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IPR2022-00311  
Patent No. 8,477,514

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**PETITIONER'S REQUEST FOR ORAL HEARING**  
**37 C.F.R. § 42.70**

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<sup>1</sup> Anker Innovations Ltd. filed a motion for joinder and a petition in IPR2022-01134 and has been joined as a petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner respectfully requests the opportunity to present oral argument. As specified in the Board’s May 23, 2022 Scheduling Order (Paper No. 12), oral argument for this IPR and IPR2022-00307, IPR2022-00308 and IPR2022-00312 are scheduled for February 23 and 24, 2023.

Given the overlap in issues between this IPR and IPR2022-00312, Petitioner believes it would be efficient for these two IPRs to be argued together in a single combined hearing.

Petitioner therefore requests a **single combined hearing for this IPR and IPR2022-00312** with **90 minutes** of argument per side (**180 minutes total**), including any time reserved for rebuttal, with Petitioner arguing first as the party with the burden of showing unpatentability. Alternatively, if the Board will hold a separate hearing in each of this IPR and IPR2022-00312, Petitioner requests **60 minutes** of argument per side (**120 minutes total**).

Petitioner requests that the oral argument be held **remotely by videoconference**, rather than in person, consistent with the Board’s notice that the Board “will only conduct an in-person hearing when requested by all parties.” *See* <<https://www.uspto.gov/patents/ptab/hearings>>. Petitioner requests the ability to present demonstratives and exhibits to the Board during the videoconference (e.g., using a “screen share” function), and the ability to have additional counsel attend the videoconference from separate locations (e.g., from Korea and Austin, TX,

where Petitioner's in-house counsel are located).

If the Board requires an in-person hearing, then Petitioner requests that its attorneys be allowed to use computers at the hearing to avoid the need for the parties to bring entire paper copies of the record into the hearing room and to facilitate efficient answering of panel questions. Petitioner would also request the following equipment: an ELMO by the lectern to display printed documents, and an HDMI cable at counsel's table to permit the display of documents from counsel's laptop computer (e.g., PowerPoint or PDF slides).

Petitioner requests oral hearing on all instituted grounds of unpatentability, disputed claim constructions, any motions to exclude, any procedural or evidentiary issues raised by the parties, and any additional issues or questions raised by the Board or the parties before or during the oral argument. Petitioner also requests oral argument on any issues raised by Patent Owner in its Request for Oral Argument.

Dated: January 9, 2023

Respectfully submitted,

/ Eliot D. Williams /

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