

Case IPR2022-00545
U.S. Patent No. 9,689,161

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CHANEL, INC.,
Petitioner,

v.

MOLO DESIGN, LTD.,
Patent Owner.

Case IPR2022-00545
U.S. Patent 9,689,161

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order dated August 10, 2022 (Paper 10), Patent Owner Molo Design LTD. (“Patent Owner”) respectfully requests oral argument on issues related to Petitioner’s failure to meet its burden for claim construction, the patentability of claims 1-10, 12, 14, 18, 19-25, and 27 of U.S. Patent No. 9,689,161 on the instituted grounds set forth in the Board’s Decision (Paper 9), any issues specified in any motions to exclude, or any other pending responses, motions or briefing filed by the parties and any supporting declarations and exhibits for the same, any issues specified by Petitioner in any request for oral argument, any procedural and evidentiary issues raised by the parties, and rebuttal to Petitioner’s presentation on all matters.

Patent Owner requests that the Board allow Petitioner and Patent Owner each a total of 60 minutes to present their arguments.

The parties jointly request that oral argument be conducted remotely via videoconference with the capability to display documents, including demonstratives and exhibits, to the Board. In the event that the Board orders that the hearing be conducted in person, Patent Owner requests permission to use a computer, projector, and screen to display possible demonstratives and exhibits.

Case IPR2022-00545
U.S. Patent No. 9,689,161

Dated: March 14, 2023

Respectfully Submitted,

By: /s/ Michael Chibib
Jared D. Schuettenhelm
Registration No. 59,539
Patrick Connolly
Registration No. 69,570
BRACEWELL LLP
701 Fifth Avenue, Suite 6200
Seattle, Washington 98104-7018
(206) 204-6200 (t)
(800) 404-3970 (f)
jared.schuettenhelm@bracewell.com
patrick.connolly@bracewelllaw.com

Michael Chibib
Registration No. 40,950
BRACEWELL LLP
111 Congress Avenue, Suite 2300
Austin, TX 78701
(512) 472-7800 (t)
(800) 404-3970 (f)
michael.chibib@bracewell.com

*Counsel for Patent Owner Molo
Design, Ltd.*