

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC., AMAZON WEB SERVICES, INC., AND
AMAZON.COM SERVICES LLC,
Petitioners,

v.

LS CLOUD STORAGE TECHNOLOGIES LLC,
Patent Owner.

Case: IPR2023-00120, IPR2023-00733
Patent: 10,154,092

PATENT OWNER'S REQUEST FOR ORAL HEARING

Patent Owner hereby respectfully requests oral argument pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 8, IPR2023-00120). Patent Owner respectfully requests a virtual hearing regarding IPR2023-00120, IPR2023-00733 be held February 21, 2024. Petitioner requests 45 minutes per side to address the issues identified in the papers in this proceeding and related issues identified in Petitioner's Request for Oral Argument, if any.

Pursuant to 37 C.F.R. § 42.70(a) and without waiving any issue not specifically identified herein, Patent Owner hereby submits this Request for Oral Argument on issues related to the patentability of the challenged claims of U.S. Patent No. 10,154,092 (" '092 patent") on the instituted grounds set forth in the Board's Institution Decision (Paper 7, IPR2023-00120; paper 10, IPR2023-00733), and on any issues specified in any motions to exclude, or any other pending motions or briefing filed.

At the oral argument, Patent Owner requests (without waiving consideration of any issue not listed below) to address the following issues:

- A. Claims 1–3, 7–12, 19–23 are not disclosed by Heil
- B. Claims 1–3, 6–24 are not obvious over Heil and Nakayama
- C. Claim 4 is not obvious over Heil, Nakayama, and Gulick
- D. Claim 5 is not obvious over Heil, Nakayama, and Berman
- E. Reply to any argument made by the Petitioner

- F. Reply to Petitioner's presentation at the Oral Argument
- G. Any and all issues briefed or presented by Patent Owner or Petitioner throughout the trial

Dated: January 8, 2024

Respectfully submitted,

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/Jacob B. Henry/

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