

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.,
Petitioner,

v.

CONSTELLATION DESIGNS, LLC,
Patent Owner.

Case No. IPR2023-00319
U.S. Patent No. 10,693,700

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's July 12, 2023 Scheduling Order (Paper 11 at 11) (DUE DATE 8), Patent Owner Constellation Designs, LLC respectfully requests an opportunity to present oral arguments before the Board. Oral argument is presently scheduled for April 17, 2024 and Patent Owner states its preference to have its arguments conducted in person at the USPTO headquarters in Alexandria, Virginia.

Issues that the Patent Owner may present and address at the hearing include proper construction of the challenged claims, written description support of the challenged claims, Petitioners' failure to prove the unpatentability of the challenged claims, Petitioners' Petition and Reply Brief, Petitioners' Sur-Sur-Reply (if filed), rebuttals to any arguments and record evidence presented by Petitioners, and any additional issues raised by the Board or Petitioners at oral argument.

Patent Owner believes that an allocation of forty-five (45) minutes per side will be sufficient. Patent Owner requests at least as much time as requested by Petitioner, but no less than forty-five minutes of argument time.

Should the hearing be conducted in person, Patent Owner respectfully requests the ability to use audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint Display. Patent Owner requests that at least three spaces be reserved at the oral hearing.

Case No. IPR2023-00319

Patent No. 10,693,700

Dated: February 28, 2024

Respectfully submitted,

/William A. Meunier/

William A. Meunier (Reg. No. 41,193)

Michael T. Renaud (Reg. No. 44,299)

Kevin C. Amendt (Reg. No. 69,361)

MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.

One Financial Center

Boston, MA 02111

Telephone: 617-542-6000

Facsimile: 617-542-2241

E-mails: WAMeunier@mintz.com;

MTRenaud@mintz.com;

KCAmendt@mintz.com

CERTIFICATE OF SERVICE

I certify that a copy of Patent Owner's Request for Oral Argument is being served by electronic mail on the following counsel of record:

Lead Counsel

W. Karl Renner
(Reg. No. 41,265)
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Telephone: (202) 783-5070
Facsimile: (877) 769-7945
Email: IPR19688-0196IP2@fr.com

Backup Counsel

Jeremy J. Monaldo (Reg. No. 58,680)
Patrick Darno (Reg. No. 69,205)
Usman Khan (Reg. No. 70,439)
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Telephone: (202) 783-5070
Facsimile: (877) 769-7945
Email: PTABInbound@fr.com

Dated: February 28, 2024

/William A. Meunier/

William A. Meunier (Reg. No. 41,193)