

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
VISA INC., and VISA U.S.A. INC.,¹
Petitioners,

v.

UNIVERSAL SECURE REGISTRY, LLC,
Patent Owner.

Case CBM2018-00024
U.S. Patent No. 8,577,813

PETITIONER APPLE INC.'S REQUEST FOR ORAL ARGUMENT

¹ Visa Inc. and Visa U.S.A. Inc., which filed a petition in CBM2019-00025, have been joined as a party to this proceeding.

Pursuant to the Board's November 20, 2018 Scheduling Order (Paper No. 11) and January 31, 2019 email granting the joint stipulation modifying certain deadlines, Petitioner Apple Inc. ("Apple") respectfully requests oral argument currently scheduled on August 27, 2019. Petitioner requests the ability to use a computer, projector, and screen to display demonstrative exhibits. Petitioner requests 30 minutes per side for each of IPR2018-00812, CBM2018-00024, and CBM2018-00025, all of which are scheduled concurrently on August 27, 2019, for a total of 90 minutes per side for all three proceedings. Petitioner respectfully submits that the differences in claim scope between the two patents at issue in addition to the varied grounds and different prior art references relied upon among the IPR2018-00812, and the CBM2018-00024, and CBM2018-00025 proceedings warrant additional time over the 60 minutes per side allotted for oral hearing in IPR2018-00809, IPR2018-00810, and IPR2018-00813, arguments for which were heard on July 16, 2019 between the same parties as this proceeding.

Pursuant to 37 C.F.R. § 42.70, Apple specifies the following issues to be argued:

- I. Whether the '813 patent qualifies as a CBM patent under 37 C.F.R. § 42.302.

- II. Whether challenged claims 1-2, 4-5, 11, 13, 16-20, and 24 are unpatentable under 35 U.S.C. § 103(a) as obvious over Maes (Ex. 1213) and the '585 reference (Ex. 1214).
- III. Whether challenged claims 6-10 are unpatentable under 35 U.S.C. § 103(a) as obvious over Maes (Ex. 1213), the '585 reference (Ex. 1214), and Maritzen (Ex. 1214).
- IV. Whether challenged claims 14, 15, 22, 23, 25, and 26 are unpatentable under 35 U.S.C. § 103(a) as obvious over Maes (Ex. 1213), the '585 reference (Ex. 1214), and Labrou (Ex. 1216).
- V. Respond to any arguments raised in Patent Owner's Preliminary Response (Paper No. 9), Patent Owner's Response (Paper No. 22) and Patent Owner's Sur-Reply (Paper No. 38).
- VI. Respond to Patent Owner's Motion to Strike (Paper No. 35) and any arguments raised in Patent Owner's Sur-Reply to Petitioner's Opposition to the Motion to Strike (*if filed*).
- VII. Respond to Patent Owner's Motion to Exclude, if one is submitted.
- VIII. Respond to any issues specified by Patent Owner in its request for oral argument.
- IX. Respond to Patent Owner's presentation on all matters.

- X. Any arguments raised by the Parties in their respective papers, motions, oppositions, responses, replies, and sur-replies.
- XI. Issues related to the Board's Decision on Institution and the grounds instituted in the Decision.
- XII. Any issues raised in the briefing pursuant to the schedule.
- XIII. Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Respectfully Submitted,

Date: July 19, 2019

/Monica Grewal/

Monica Grewal
Registration No. 40,056

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2019, I caused a true and correct copy of Petitioner Apple Inc.'s Request for Oral Argument to be served via electronic mail on the following correspondents of record as listed in Patent Owners' Mandatory Notices and in Paper 34 (Decision to Institute CBM2019-00025 Granting Motion for Joinder):

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Respectfully Submitted,

Date: July 19, 2019

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