UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA MOBILITY LLC Petitioner

v.

ARNOUSE DIGITAL DEVICE CORPORATION Patent Owner

Inter Partes Review No. IPR2013-00010

Patent No. 7,516,484

PETITIONER'S REQUEST FOR ORAL ARGUMENT

65566979V.8



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Pursuant to the Board's February 12, 2013, Scheduling Order (Paper 16), Petitioner, Motorola Mobility LLC, respectfully requests oral argument for the trial currently scheduled on November 7, 2013. Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- I. The proper construction of: "connector for connecting" and "wherein the readers are configured so that they will not operate with a computer other than a portable computer of the system."
- II. Whether claims 1, 3, 7, 15, 16, 18, and 20 of U.S. Patent No.
 7,516,484 ("the '484 patent") are anticipated by U.S. Patent No.
 5,463,742 to Kobayashi ("Kobayashi").
 - a. Among other things, whether Kobayashi discloses a "security protocol."

III. Whether claims 1, 3, 7, 15, 16, 18, and 20 of the '484 patent are anticipated by U.S. Patent No. 5,436,857 to Nelson ("Nelson").

a. Among other things, whether the portable computer and the portable base unit of Nelson have a specialized design.

Respectfully submitted,

Ko-Fang Chang Registration No. 50,829 Lead Counsel for Petitioner

Steven D. Moore Admitted Pro Hac Vice Back-Up Counsel for Petitioner

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this Reply has been served

electronically via email on September 30, 2013, upon the following:

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Dated: September 30, 2013

By: Ko-Fang Chang

Registration No. 50,829 Lead Counsel for Petitioner

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