

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BLACKBERRY CORPORATION AND BLACKBERRY LIMITED
Petitioner

v.

MOBILEMEDIA IDEAS LLC
Patent Owner

Case IPR2013-00016 (JYC)
Patent U.S 6,441,828.

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70**

Pursuant to 37 C.F.R. § 42.70, MobileMedia Ideas LLC (“Patent Owner”) hereby requests oral argument for the trial currently scheduled for October 18, 2013. The Patent Owner specifies the following issues to be argued, pursuant to 37 C.F.R. § 42.70(a).

ISSUES TO BE ARGUED

- I. The Patent Owner’s Motion to Amend the Patent was filed after conferring with the Board and is compliant with the requirements of the statutes, regulations, Office Patent Trial Practice Guide, and the requests of the Board:
 - a. the Motion to Amend explained how the proposed substitute claims 19-23 are patentable over the art of record;
 - b. the Motion to Amend explained how the proposed substitute claims 19-23 should be construed; and
 - c. the scope of proposed substitute claims 19-23 are narrower than the scope of the original claims.
- II. Proposed substitute claims 19-23 are fully supported by the patent specification and are definite.

III. Proposed substitute claims 19-23 are patentable and patentably distinct and non-obvious over the prior art combinations relied upon by Petitioner.

If any fees are due in connection with this matter, the Commissioner is hereby authorized to charge them to Attorney Deposit Account 50-3081.

Date: September 9, 2013
PROSKAUER ROSE LLP
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John C. Stellabotte, Reg. No. 47,969
Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70** was served on September 9, 2013 in its entirety electronically on:

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