

Filed on Behalf of MPHJ TECHNOLOGY INVESTMENTS, INC
By: Scott A. Horstemeyer (scott.horstemeyer@thomashorstemeyer.com)
THOMAS | HORSTEMEYER, LLP
400 Interstate North Parkway, SE
Suite 1500
Atlanta, Georgia 30339
Tel: (770) 933-9500
Fax: (770) 951-0933

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RICOH AMERICAS CORPORATION AND XEROX CORPORATION,

Petitioners

V.

MPHJ TECHNOLOGY INVESTMENTS, LLC,

Patent Owner

Case IPR2013-00302

Patent 7,986,426

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

Pursuant to 37 C.F.R. § 42.70, MPHJ Technology Investments LLC (“Patent Owner”) hereby requests oral argument for the trial currently scheduled for August 18, 2014. The Patent Owner specifies the following issues to be argued, pursuant to 37 C.F.R. § 42.70(a).

ISSUES TO BE ARGUED

1. Claims 1-11 of U.S. Patent No. 7,986,426 (hereinafter “the ’426 Patent”) are patentable over XNS, as relied upon by Petitioner.
2. Claims 1-11 the ’426 Patent are patentable over Salgado, as relied upon by Petitioner.
3. Glenn Weadock is a person of at least ordinary skill in the art who is qualified to testify with regard to the patent-at-issue.
4. Responses to leading questions in the deposition testimony of Dr. Melen, submitted as Ex. 2003, should be excluded from evidence as set forth in Patent Owner’s Motion to Exclude.

Respectfully submitted,
Thomas | Horstemeyer LLP

/ Scott A. Horstemeyer /

Scott Horstemeyer
Lead Counsel
Attorney for Patent Owner

Registration No. 34,183

July 14, 2014

Date

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70 was served on counsel of record on July 14, 2014 and that this document was filed through the Patent Review Processing System and served electronically via email.

Michael D. Specht
Jason D. Eisenberg
H. Keeto Sabharwal (*pro hac vice* admittance)(Paper 19)
Dennies Varughese
Richard M. Bemben
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.
1100 New York Avenue, NW
Washington, DC 20005
202.371.2600 (reception)
202.371.2540 (facsimile)
Mspecht-PTAB@skgf.com
Jeisenbe-PTAB@skgf.com
keetos-PTAB@skgf.com
dvarughe-PTAB@skgf.com
rbemben-PTAB@skgf.com

Respectfully submitted,
Thomas | Horstemeyer LLP

/ Scott A. Horstemeyer /

Scott Horstemeyer
Lead Counsel
Attorney for Patent Owner
Registration No. 34,183

July, 14, 2014
Date