

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CARDIOCOM, LLC

Petitioner

v.

ROBERT BOSCH HEALTHCARE SYSTEMS, INC.

Patent Owner

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Case IPR2013-00451

Patent No. 7,587,469

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

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, Robert Bosch Healthcare Systems, Inc. (“Bosch”) hereby requests oral argument currently scheduled for September 9, 2014, in the present *inter partes* review proceeding. Bosch specifies the following issues to be argued:

1. Whether Petitioner has met its burden to prove that a person of ordinary skill would have combined the teachings of Cohen (Exhibit 1002) and Wahlquist (Exhibit 1003), as alleged in the Petition;
2. Whether Petitioner has met its burden to prove that a person of ordinary skill would have combined the teachings of Cohen, Wahlquist, Neumann (Exhibit 1004), and Jacobs (Exhibit 1005), as alleged in the Petition;
3. Whether Petitioner’s expert applied a proper methodology in his obviousness analysis;
4. Whether claims 1, 2, and 5-10 of US Patent No. 7,587,469 (the “’469 Patent”) (Exhibit 1001) are obvious over Cohen and Wahlquist;
5. Whether claims 1, 2, and 5-10 of the ’469 Patent are obvious over Cohen, Wahlquist, Neumann, and Jacobs;
6. The appropriate construction to be given the disputed claim terms;
7. Reply to any arguments raised in the Petitioner’s Reply;

8. Response to any issues specified by Petitioner in its request for oral argument;
9. Whether Bosch's Motion to Exclude should be granted;
10. Response to Petitioner's presentation on all matters; and
11. Any other issues briefed or presented by the parties throughout this trial.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: July 30, 2014

By: /Don Daybell/

Don Daybell

Reg. No. 50,877

Attorney for Patent Owner

**CERTIFICATION OF SERVICE (37 C.F.R. § 42.6(e))**

The undersigned hereby certifies that the above-captioned “**PATENT OWNER’S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. §42.70**” was served in its entirety on **July 30, 2014**, upon the following parties via e-mail:

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