UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CARDIOCOM, LLC

Petitioner

v.

ROBERT BOSCH HEALTHCARE SYSTEMS, INC.

Patent Owner

Case IPR2013-00468
Patent No. 7,516,192

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 Wright Jr. (Exhibit 1002) and Goodman (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 Goodman and Wahlquist (Ex 1004), as alleged in the Petition;

3. Whether Petitioner's expert applied a proper methodology in his obviousness analysis;

4. Whether claims 1-3, 6, 7, 11, 12, 17-19, 20-23, 29-30, and 35-36 of US Patent No. 7,516,192 (the "'192 Patent") (Exhibit 1001) are obvious over Wright Jr.;

5. Whether claims 1-37 of the '192 Patent are obvious over Wright Jr. and Goodman;

6. Whether claims 20-37 of the '192 Patent are obvious over Goodman in combination with Wahlquist;

7. Whether Petitioner has disproved Patent Owner's significant evidence of objective indicia of nonobviousness for the '192 Patent;

8. The appropriate construction to be given the disputed claim terms;

9. Reply to any arguments raised in the Petitioner's Reply;

10. Response to any issues specified by Petitioner in its request for oral argument;

11. Whether Bosch's Motion to Exclude should be granted;

12. Response to Petitioner's presentation on all matters; and

13. 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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