

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, INC.

SAP AMERICA INC.

Petitioners

v.

CLOUDING IP, LLC

Patent Owner

Case IPR2013-000586

Case IPR2014-00306

Patent 6,738,799

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

37 C.F.R. § 42.70

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner respectfully requests oral argument on the issues set forth below at a place and time set by the Board. Oral argument is presently scheduled for October 16, 2014 (Paper No. 10, Scheduling Order). To allow for a complete review of the issues presented in this proceeding, Patent Owner requests one hour of argument time.

### ISSUES TO BE ADDRESSED DURING ORAL ARGUMENT

- A. Claims 1, 12, 23, 24, 30, 31, 37, and 42 are patentable over Williams under 35 U.S.C. § 102(e);
- B. Claims 5-10 and 16-21 are patentable over Williams and Miller under 35 U.S.C. § 103(a);
- C. Claims 37 and 42 are patentable over Balcha under 35 U.S.C. § 102(e);
- D. Claims 1, 5, 9, 10, 12, 16, 20, 21, 23, 24, 30, and 31 are patentable over Balcha and Miller under 35 U.S.C. § 103(a);
- E. Claims 6-8 and 17-19 are patentable over Balcha, Miller, and Freivald under 35 U.S.C. § 103(a); and
- F. Claims 37 and 42 are patentable over Balcha and Freivald under 35 U.S.C. § 103(a);
- G. Patent Owner's Contingent Motion to Amend, if necessary, should be

granted and Proposed Substitute Claim 47, as presented therein, deemed patentable.

Respectfully submitted,

Dated: September 11, 2014

/Tarek N. Fahmi/

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

### PATENT OWNER'S REQUEST FOR ORAL HEARING

was served on September 11, 2014, by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail directed to the attorneys of record for the Petitioners at the following addresses:

For Petitioner Unified Patents, Inc.	For Petitioner SAP America Inc.
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The parties have agreed to electronic service in this matter.

Respectfully submitted,

Dated: September 11, 2014

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