

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROADCOM CORPORATION
Petitioner

v.

WI-FI ONE, LLC
Patent Owner

Case IPR2013-00601
Patent 6,772,215

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

In accordance with 37 C.F.R. § 42.70(a), Patent Owner respectfully requests an opportunity to present oral argument before the Board. Oral argument is presently scheduled for December 8, 2014 in IPR2013-00601 relating to U.S. Patent No. 6,772,215 (“the ’215 patent”).¹ (*See* Scheduling Order, Paper 30, p.5).

The issues to be argued include:

1. Petitioner does not have standing to file the Petition;
2. The Petition is barred by 35 U.S.C. § 315(b);
3. The broadest reasonable construction of “responsive to the receiving step, constructing a message field for a second data unit, said message field including a type identifier field”;
4. The printed matter doctrine does not apply to the “type identifier field”;
5. U.S. Pat. No. 6,581,176 to Seo does not anticipate claims 1, 2, 4, 6, 8, 15, 22, 25, 26, 29, 32, 34, 45, 46, 49, 52, and 54 of the ’215 Patent under 35 U.S.C. § 102 (Ground 1);
6. Patent Owner’s Motion to Exclude Evidence;

¹ In addition, the Board also has scheduled the oral hearing for December 8, 2014, in two other co-pending *inter partes* review proceedings, IPR2013-00602 and -00636.

7. Any other issues briefed by or presented by the parties throughout this trial;
and
8. Any issue argued by Petitioner during the oral argument.

Patent Owner requests 60 minutes to present its argument. Patent Owner also requests the ability to use audio-visual equipment to display demonstrative exhibits, including the use of a projector and screen for power point display.

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Case IPR2013-00601

Patent 6,772,215

CERTIFICATE OF SERVICE

The undersigned certifies that on November 12, 2014 the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was served on Lead and Back-up Counsel for Broadcom Corporation by sending the same via electronic mail to the address provided by Broadcom:

Dominic E. Massa, Lead Counsel
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