

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BROADCOM CORPORATION  
Petitioner

v.

WI-FI ONE, LLC  
Patent Owner

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Case IPR2013-00602  
Patent 6,466,568

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**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 IPR2013-00602 relating to U.S. Patent No. 6,466,568 (“the ’568 patent”).<sup>1</sup> (See Scheduling Order, Paper 28, 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 the term “service type identifier which identifies a type of payload information”;
4. U.S. Pat. No. 5,488,610 to Morley does not anticipate claims 1-6 of the ’568 Patent under 35 U.S.C. § 102 (Ground 1);
5. Claims 1-6 of the ’568 Patent are patentable over U.S. Pat. No. 5,541,662 to Adams under 35 U.S.C. § 103 (Ground 2);
6. Proposed substitute claims 8-13 do not add new matter;
7. Proposed substitute claims 8-13 are patentable over the known prior art;

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<sup>1</sup> In addition, the Board also has scheduled the oral hearing for December 8, 2014, in two other co-pending *inter partes* review proceedings, IPR2013-00601 and -00636.

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

Patent Owner requests 90 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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**Counsel for Patent Owner**

Case IPR2013-00602

Patent 6,466,568

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  
Michael A. Diener, Back-up Counsel  
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