

Paper No. \_\_\_\_

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

BROADCOM CORPORATION

Petitioner

v.

WI-FI ONE, LLC

Patent Owner

---

Case IPR2013-00602  
U.S. Patent No. 6,466,568

---

**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to the Board's March 10, 2014 Scheduling Order (Paper No. 28) and the Notice of Stipulated Modification of Due Dates 4-5 (Paper No. 48), Petitioner Broadcom Corp. ("Broadcom") respectfully requests oral argument currently scheduled on December 8, 2014.

Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued (without intent to waive consideration of any issue not requested):

- I. Whether challenged claims 1-6 are unpatentable under 35 U.S.C. § 102 as anticipated by Morley.
- II. Whether challenged claims 1-6 are unpatentable under 35 U.S.C. § 103 as obvious over Adams.
- III. Whether proposed substitute claims 8-13 are unpatentable under 35 U.S.C. § 112, first paragraph, as having no written description support.
- IV. Whether proposed substitute claims 8-13 are unpatentable under 35 U.S.C. § 102 as anticipated by Morley.
- V. Whether proposed substitute claims 8-13 are unpatentable under 35 U.S.C. § 103 as obvious over Morley in view of Raith.
- VI. Whether proposed substitute claims 8-11 are unpatentable under 35 U.S.C. § 102 as anticipated by Tiernan.

- VII. Whether proposed substitute claims 12-13 are unpatentable under 35 U.S.C. § 103 as obvious over Tiernan.
- VIII. Reply to any arguments raised in Patent Owner's Response.
- IX. Reply to any arguments raised in Patent Owner's Motion to Amend.
- X. Reply to any arguments raised in Patent Owner's Reply to Petitioner's Opposition to Motion to Amend.
- XI. Respond to any issues specified by Patent Owner in its request for oral argument.
- XII. Respond to Patent Owner's presentation on all matters.
- XIII. Any additional issues on which the Board seeks clarification.

Broadcom requests one hour of total argument to address these issues.

Because Broadcom bears the burden of proving the unpatentability of the existing claims, Broadcom requests the Board to permit it to argue first. 77 Fed. Reg. 45756, 48768. Broadcom requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits. In accordance with the Trial Practice Guide, 77 Fed. Reg. at 48768, Broadcom will also contact the Board Trial Division paralegal to discuss this request.

Dated: November 12, 2014

Respectfully submitted,

/Michael A. Diener/

Michael A. Diener, Reg. No. 37,122

WILMER CUTLER PICKERING HALE  
AND DORR LLP  
60 State St.  
Boston, MA 02109

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 12, 2014, I caused a true and correct copy of the foregoing PETITIONER'S REQUEST FOR ORAL ARGUMENT to be served via email on the attorneys identified in Wi-Fi One's Updated Mandatory Notice and Notice of Appearance for John Shumaker, whom consented to electronic service:

Lead Counsel:	Peter J. Ayers
Back-up Counsel:	J. Christopher Lynch, John Shumaker
Email Address:	EricssonIPR2013-602@leehayes.com

/Michael A. Diener/  
Michael A. Diener  
Registration No. 37,122