

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY MOBILE COMMUNICATIONS (USA) INC.  
Petitioner

v.

B.E. TECHNOLOGY, L.L.C.  
Patent Owner

Patent No. 6,771,290

Issue Date: Aug. 3, 2004

Title: COMPUTER INTERFACE METHOD AND APPARATUS WITH  
PORTABLE NETWORK ORGANIZATION SYSTEM AND TARGETED  
ADVERTISING

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**PETITIONER'S JOINT REQUEST FOR ORAL ARGUMENT**

No. IPR2014-00029

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Pursuant to 37 C.F.R. § 42.70(a), requiring a separate paper requesting oral argument and specifying issues to be argued, Petitioner Sony Mobile Communications (USA) Inc. ("SoMC") submits this joint Request for Oral Argument. The Board has already scheduled the Oral Hearing for December 11, 2014. *See* Paper 8, at 5 (Scheduling Order).

*Inter partes* review nos. IPR2014-00029 (SoMC), IPR2014-00031(Google), IPR2014-0033 (Google), IPR2014-00040 (Microsoft) and IPR2014-00044 (Samsung) all challenge the patentability of claims in U.S. Patent No. 6,771,290 ("the '290 Proceedings"). Accordingly, the petitioners of the '290 Proceedings ("Petitioners") are coordinating their efforts so that the Board can efficiently conduct a single hearing on these related proceedings. Petitioners propose that they jointly present argument on the issues as identified below, that Patent Owner follows with its response, and that Petitioners use their remaining time for rebuttal. Because some of the grounds in the five proceedings overlap and others do not, Petitioners plan to present their opening and rebuttal views through two designees, with other representatives offering additional views only if necessary.

The Petitioners collectively request 90 minutes of argument time for Petitioners and 90 minutes of argument time for Patent Owner to address the following issues:

1. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00029, Paper No. 7 (Institution Decision).

2. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00031, Paper No. 9 (Institution Decision).

3. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00033, Paper No. 9 (Institution Decision).

4. Grounds for which *inter partes* review was instituted as to claims 1-3 of the '290 patent in IPR2014-00040, Paper No. 12 (Institution Decision).

5. Grounds for which *inter partes* review was instituted as to claims 2-3 of the '290 patent in IPR2014-00044, Paper No. 11 (Institution Decision).

6. Any issues properly raised by Patent Owner, including in Patent Owner's Responses in the '290 Proceedings.

7. Any issues addressed by Petitioners, including in the Petitions for *Inter Partes* Review and Replies in the '290 Proceedings.

8. Respond to Patent Owner's arguments regarding the claim construction standard to be used in these proceedings, and relevance, if any, to the patentability issues raised by the original claims.

9. Issues related to all exhibits filed in this proceeding.

10. Rebuttal to issues raised by the Patent Owner.

SoMC requests permission to use audio/visual equipment to display demonstrative exhibits, including a projector and screen for PowerPoint or PDF slides.

Dated: October 31, 2014

/s/ John Flock

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**Certificate of Service Under 37 C.F.R. § 42.6(e)(4)**

I certify that I caused a true and correct copy of the forgoing to be served via electronic mail on the following:

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Dated: October 31, 2014

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