

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.
Petitioner

v.

B.E. TECHNOLOGY, LLC
Patent Owner

Case IPR2014-00031
Patent 6,771,290 B1

PETITIONER'S JOINT REQUEST FOR ORAL ARGUMENT

Before SALLY C. MEDLEY, KALYAN K. DESHPANDE, and LYNNE E. PETTIGREW, Administrative Patent Judges.

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.70(a), requiring a separate paper requesting oral argument and specifying issues to be argued, Petitioner Google Inc. submits this joint Request for Oral Argument. The Board has already scheduled the Oral Argument for December 11, 2014. Paper 10, p. 5 (Scheduling Order).

Inter partes review nos. IPR2014-00029 (Sony), 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 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.

Google 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

Respectfully submitted,

By: /Clinton H. Brannon/
Clinton H. Brannon
Reg. No. 57,887

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e), I, Clinton Brannon, hereby certify that a copy of the foregoing **PETITIONER'S JOINT REQUEST FOR ORAL ARGUMENT** has been served via electronic mail transmission on the Attorney of Record for related *inter partes* review petitions of U.S. Patent No. 6,771,290 (No. IPR2014-00031) at the following address:

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