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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WAVEMARKET, INC. D/B/A LOCATION LABS
Petitioner

v.

LOCATIONNET SYSTEMS, LTD.
Patent Owner

Case No. IPR2014-00199
U.S. Patent 6,771,970

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

Patent Owner LocatioNet Systems, Ltd. (“Patent Owner”) respectfully requests oral argument in IPR2014-00199 under 37 C.F.R. § 42.70(a). Pursuant to the Scheduling Order dated May 9, 2014 (Paper 19), oral argument is currently scheduled for February 3, 2015 (Paper 19, Due Date 7).

Oral argument will focus on the patentability of the challenged claim of U.S. Patent No. 6,771,970 (“the ’970 Patent”), and Patent Owner specifies the following principal issues to be argued, without intent to waive consideration of any allowable issue not requested or raised by Petitioners:

- A. An technical overview of the ’970 Patent and claim 18.
- B. The proper construction of the claim term “map database.”
- C. The proper construction of the claim term “map engine for manipulating said map database.”
- D. The teachings of the art relied upon for which trial was instituted, *i.e.*, U.S. Patent No. 6,243,039 to Elliot (Exhibit 1003).
- E. Petitioner’s failure to prove by a preponderance of the evidence that claim 18 of U.S. Patent No. 6,771,970 is unpatentable under 35 U.S.C. 102(e) as allegedly being anticipated by Elliot.
- F. Issues raised by Patent Owner’s motion to exclude, including whether the declaration of Petitioner’s reply witness, Dr. Craig Rosenberg, is inadmissible evidence.

G. Any additional issues for which the Board requests argument or any other issue raised by Petitioner prior to or at oral argument.

Patent Owner additionally requests permission to present handouts of demonstrative exhibits during the oral argument.

Dated: December 30, 2014

Respectfully submitted,
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Attorney for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December, 2014, a true and correct copy of the foregoing Patent Owner's Request for Oral Argument Under 37 C.F.R. § 42.70 was served on the following counsel for Petitioner Wavemarket, Inc. d/b/a Location Labs via email and Federal Express Mail:

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