## UNITED STATES PATENT AND TRADEMARK OFFICE

\_\_\_\_\_

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

\_\_\_\_\_

Google Inc. and Motorola Mobility LLC

Petitioners,

V.

Arendi S.A.R.L.

Patent Owner

\_\_\_\_\_

Case No. IPR2014-00452

Patent No. 6,323,853

PATENT OWNER ARENDI S.A.R.L.'S REQUEST FOR ORAL ARGUMENT UNDER 37 C.F.R  $\S$  42.70



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

Arendi S.A.R.L. ("Patent Owner") hereby requests the opportunity to have an oral argument at the Board pursuant to 37 C.F.R. § 42.70. Patent Owner requests an oral hearing totaling one hour to be divided equally between the Patent Owner, on the one hand, and Petitioners, on the other.

Under 37 C.F.R. § 42.70(a), and without intending to waive any issue not specifically identified, Patent Owner submits the following issues to be argued:

- 1. Failure to show unpatentability of claims 1-9, 11, 13-29, 38-45, 57-64, 66, 68-75, 77 and 79 for obviousness over Goodhand.
- 2. Failure to show unpatentability of claims 6, 10, 12, 21, 27, 30-37, 42, 46-56,61, 65, 67, 72, 76 and 78 for obviousness over Goodhand and Padwick.
- 3. Any issue raised in Petitioners' or Patent Owner's Papers, including but not limited to the Petition (Paper 1), Patent Owner's response (Paper 17) or Petitioners' reply (Paper 23) and accompanying exhibits.
- 4. Rebuttal to Petitioners' presentation as to all matters.

Patent Owner requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector to be connected to a laptop and a screen for displaying documents.



Dated: March 10, 2015 Respectfully submitted,

/Robert Asher, #30,445/
Robert Asher
Registration No. 30,445
Sunstein Kann Murphy & Timbers LLP
125 Summer Street
Boston, MA 02110-1618
(617) 443-9292
Attorney for Patent Owner, Arendi S.A.R.L.



## CERTIFICATE OF SERVICE

It is certified that on March 10, 2015, copies of the Request for Oral Argument under 37 C.F.R. § 42.70 have been served on Petitioners as provided in 37 C.F.R. § 42.6(e) by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail directed to the attorneys of record for the Petitioner at the following addresses:

LEAD COUNSEL FOR PETITIONERS GOOGLE INC. AND MOTOROLA MOBILITY LLC

MATTHEW A. SMITH smith@turnerboyd.com
Registration No. 49,003
TURNER BOYD LLP
702 Marshall St., Ste. 640
Redwood City, CA 94063
Tel: (650) 265-6109

Fax: (650) 521-5931

BACK-UP COUNSEL FOR PETITIONERS GOOGLE INC. AND MOTOROLA MOBILITY LLC

ZHUANJIA GU
gu@turnerboyd.com
Registration No. 51,758
TURNER BOYD LLP
702 Marshall St., Ste. 640
Redwood City, CA 94063
Tel: (650) 265-6109
Fax: (650) 521-5931

ROBERT J. KENT kent@turnerboyd.com TURNER BOYD LLP 702 Marshall St., Ste. 640 Redwood City, CA 94063 Tel: (650) 265-6109 Fax: (650) 521-5931

Date: March 10, 2015 /Robert Asher, #30,445/

Robert Asher

Registration No. 30,445

Sunstein Kann Murphy & Timbers LLP

125 Summer Street Boston, MA 02110 Tel: (617) 443-9292 Fax: (617) 443-0004

