

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC., HTC CORPORATION, HTC AMERICA, INC., SAMSUNG  
ELECTRONICS CO. LTD, SAMSUNG ELECTRONICS AMERICA, INC., AND  
AMAZON.COM, INC.,

Petitioners,

v.

MEMORY INTEGRITY, LLC,

Patent Owner

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Case IPR2015-00159

Patent 7,296,121

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a) and the Updated Scheduling Order (Paper 16), Petitioners submit this Request for Oral Argument on all of the instituted grounds of unpatentability of U.S. Patent No. 7,296,121. A Request for Oral Argument in the related IPR proceeding, IPR2015-00163, is being filed on this same day.

Petitioners respectfully request that the Board allocate two hours for Petitioner and two hours for Patent Owner (i.e., four hours total) to present oral arguments in a consolidated hearing for IPR2015-00159 and IPR2015-00163. Petitioners suggest an allocation of an hour per side to address the Pong and Koster references presented in the IPR2015-00159 and IPR2015-00163 petitions (presenting in the standard order of Petitioner, then Patent Owner, and finally Petitioner), a short break, and then an hour per side to address the motion to amend submitted by Patent Owner in IPR2015-00159 and IPR2015-00163 (presenting in the standard motion to amend order of Patent Owner, then Petitioner, and finally Patent Owner).

With regard to this particular proceeding, Petitioners request (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether claims 1–3, 8, 11, 15, 16, and 25 are unpatentable under 35

- U.S.C. § 102 as anticipated by Pong;
2. Whether claims 17–24 are unpatentable under 35 U.S.C. § 103 as obvious over Pong and Smith;
  3. Whether Patent Owner has carried its burden to demonstrate that substitute claims 26-34 are patentable over the prior art of record and known to the Patent Owner, including Culler and Laudon; and
  4. Any additional issues on which the Board seeks clarification. The Board has already scheduled Oral Hearing for February 8, 2016. *See Updated Scheduling Order of July 9, 2015, Paper No. 16.*

Respectfully submitted,

Dated: 1-11-16

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## CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on January 11, 2016, a complete and entire copy of this Petitioner's Request for Oral Argument was provided via email to the Patent Owner by serving the correspondence email address of record as follows:

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