
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

MEMORY INTEGRITY, LLC
Patent Owner

U.S. Patent No. 7,296,121

Inter Partes Review Case No. 2015-00163

**PATENT OWNER REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)**

Pursuant to 37 C.F.R. § 42.70(a), the Board's May 8, 2015 Scheduling Order (Paper 19), and the June 2, 2015 Joint Stipulation Regarding Due Dates (Paper 21), Patent Owner Memory Integrity, LLC hereby requests an oral argument on the issues set forth below at a time set by the Board. Oral argument is presently scheduled for February 8, 2016 (Paper 23 –Update to Scheduling Order).

The Board has also scheduled oral argument in IPR2015-00158 and IPR2015-00159 on the same date of February 8, 2016. In the interest of efficiency, Patent Owner respectfully requests that the Board hold a consolidated hearing with IPR2015-00158 and IPR2015-00159, which, along with the instant matter, all relate to U.S. Patent No. 7,296,121.

Patent Owner requests a three-hour consolidated hearing, with 90 minutes of argument time for Patent Owner and 90 minutes to be divided among the Petitioners. With respect to this proceeding, Patent Owner requests oral argument on all issues raised in the parties' filings, including but not limited to the following:

1. Whether claims 4-6, 11-12, and 19-24 of U.S. Patent No. 7,296,121 are unpatentable based on the grounds on which the Board instituted trial;
2. Whether Patent Owner's contingent Motion to Amend should be granted;

3. Any issues specified in any motions to exclude or motions for observation regarding cross-examination of reply witness filed by the parties;
4. Any issues specified by Petitioner in a request for oral argument;
5. Rebuttal to Petitioner's presentation on all matters; and
6. Any issues otherwise raised by the Board.

Patent Owner also requests that the Board provide audio-visual equipment to display a demonstrative PowerPoint presentation. The requested equipment includes a projector to be connected to Patent Owner's laptop computer, and a screen for displaying the projected image.

Date: January 11, 2016

Respectfully submitted,

/Jonathan D. Baker/

Jonathan D. Baker

Reg. No. 45708

Farney Daniels PC

411 Borel Avenue, Suite 350

San Mateo, California 94402

Phone: 424-268-5210

E-mail: jbaker@farneydaniels.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner Request for Oral Argument Pursuant to 37 CFR § 42.70(a) was served via email on January 11, 2016, on the attorneys for the Petitioners:

W. Karl Renner, Reg. No. 41,265
Roberto Devoto, Reg. No. 55,108
Michael Rueckheim, *pro hac vice*
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Phone: 202-783-5070
Fax: 202-783-2331
Email: IPR39521-0007IP1@fr.com
IPR39521-0007IP2@fr.com
IPR39521-0007IP3@fr.com
IPR39521-0007IP4@fr.com
renner@fr.com
devoto@fr.com
rueckheim@fr.com

Date: January 11, 2016

/Jonathan D. Baker/
Jonathan D. Baker
Reg. No. 45708