

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., AND
AMAZON.COM, INC.,

Petitioners,

v.

MEMORY INTEGRITY, LLC,

Patent Owner

Case IPR2015-00163

Patent 7,296,121

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Updated Scheduling Order (Paper 23), Petitioners submit this Request for Oral Argument on all of the instituted grounds of unpatentability of U.S. Patent No. 7,296,121. A Requests for Oral Argument in the related IPR proceeding. IPR2015-00159, 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 (where the parties present in the standard order of Petitioners, then Patent Owner, and finally Petitioners), 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 (where the parties present in the standard motion to amend order of Patent Owner, then Petitioners, 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 4–6 and 11 are unpatentable under 35 U.S.C. § 102 as

- anticipated by Koster;
2. Whether claims 19–24 are unpatentable under 35 U.S.C. § 103 as obvious over Koster and Smith;
 3. Whether Patent Owner has carried its burden to demonstrate that substitute claims 29-34 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. 23.*

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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