

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SONY COMPUTER ENTERTAINMENT AMERICA LLC  
Petitioner

v.

APLIX IP HOLDINGS CORPORATION  
Patent Owner

---

Case No. IPR2015-00229  
Patent No. 7,667,692

---

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

Patent Owner, Aplx IP Holdings Corporation, requests oral argument pursuant to 37 C.F.R. § 42.70. Pursuant to the Scheduling Order entered May 29, 2015 (Paper 16), Patent Owner respectfully requests two and a half hours of oral argument, in total, for the proceedings currently scheduled for hearing on January

19, 2016.<sup>1</sup> Patent Owner specifies the following issues, without waiving other issues, to be argued:

1. Petitioner cites no evidence of obviousness of claims 1-3, 5, 7-10, 12, 13, 15-18, and 20;
2. Person of ordinary skill in the art;
3. Hedberg does not qualify as prior art for an obviousness determination since it is not analogous to the '692 patent;
4. Liebenow and Armstrong do not render claims 3 and 5 unpatentable under 35 U.S.C. § 103(a) as obvious;
5. Liebenow and Hedberg do not render claims 11, 13, and 19 unpatentable under 35 U.S.C. § 103(a) as obvious;

---

<sup>1</sup> The Board has scheduled hearings for January 19, 2016, in five proceedings:  
IPR2015-00229 ('692 patent)  
IPR2015-00230 ('245 patent)  
IPR2015-00396 ('313 patent)  
IPR2015-00476 ('313 patent)  
IPR2015-00533 ('313 patent)

Patent Owner requests 2 ½ hours for its presentation regarding all of these proceedings, which would be the equivalent of affording each proceeding approximately 30 minutes. Patent Owner anticipates that some proceedings may require more or less time within the 2 ½ hours.

6. Secondary considerations show that the '692 patent's claims are not obvious;
7. Petitioner's Expert Declarations of Gregory F. Welch (Exhibits 1008 and 1041);
8. Response to arguments raised in Petitioner's Reply;
9. Response to any issues specified by Petitioner in its request for oral argument; and
10. Any other issues briefed or presented by the parties throughout this trial.

Finally, Aplix requests authorization to use audio-visual equipment—a projector and screen—at the hearing for displaying demonstrative exhibits.

Dated: December 23, 2015.

By:           /Sybil L. Dunlop/          

Robert J. Gilbertson (pro hac vice)  
Sybil L. Dunlop (pro hac vice)  
X. Kevin Zhao (pro hac vice)  
GREENE ESPEL PLLP  
222 South Ninth Street, Suite 2200  
Minneapolis, MN 55402  
Telephone: (612) 373-0830  
Facsimile: (612) 373-0929  
E-mail: BGilbertson@GreeneEspel.com  
SDunlop@GreeneEspel.com  
KZhao@GreeneEspel.com

Michael Mauriel, USPTO Reg. No. 44,226  
Sherman W. Kahn (pro hac vice)  
MAURIEL KAPOUYTIAN WOODS LLP  
15 West 26th Street, Floor 7  
New York, NY 10010  
Telephone: (212) 529-5131  
Facsimile: (212) 529-5132  
E-mail: mmauriel@mkwllp.com  
skahn@mkwllp.com

*Attorneys for Patent Owner  
Aplix IP Holdings Corporation*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on this 23rd day of December 2015, the foregoing Patent Owner Aplix IP Holdings Corporation's Request for Oral Argument is being served via email on the following counsel of record for petitioner.

<b>Lead Counsel</b>	<b>Back-Up Counsel</b>
Eric A. Buresh (Reg. No. 50,394) <a href="mailto:Eric.buresh@eriseip.com">Eric.buresh@eriseip.com</a>	Abran J. Kean (Reg. No. 58,540) <a href="mailto:Abran.kean@eriseip.com">Abran.kean@eriseip.com</a>
<u>Postal and Hand-Delivery Address:</u> ERISE IP, P.A. 6201 College Blvd., Suite 300 Overland Park, Kansas 66211 Telephone: (913) 777-5600 Fax: (913) 777-5601	<u>Postal and Hand-Delivery Address:</u> ERISE IP, P.A. 5600 Greenwood Plaza Blvd., Suite 200 Greenwood Village, Colorado 80111 Telephone: (913) 777-5600 Fax: (913) 777-5601

Dated: December 23, 2015.

/Sybil L. Dunlop/

Robert J. Gilbertson (pro hac vice)  
Sybil L. Dunlop (pro hac vice)  
X. Kevin Zhao (pro hac vice)  
GREENE ESPEL PLLP  
222 South Ninth Street, Suite 2200  
Minneapolis, MN 55402  
Telephone: (612) 373-0830  
Facsimile: (612) 373-0929

*Counsel for Patent Owner Aplix IP Holdings Corporation*