

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. IPR2015-00396
Patent No. 7,218,313

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

Patent Owner, Aplix IP Holdings Corporation, requests oral argument pursuant to 37 C.F.R. § 42.70. Pursuant to the Scheduling Order entered June 22, 2015 (Paper 12), Patent Owner respectfully requests two and a half hours of oral argument, in total, for the proceedings currently scheduled for hearing on January

19, 2016.¹ Patent Owner specifies the following issues, without waiving other issues, to be argued:

1. Person of ordinary skill in the art;
2. Willner does not qualify as prior art for an obviousness determination since it is not analogous to the '313 patent;
3. Hedberg does not qualify as prior art for an obviousness determination since it is not analogous to the '313 patent;
4. Pallakoff, Ishihara, and Martin do not render claims 1, 3, 5, 6, 8-10, and 12 unpatentable under 35 U.S.C. § 103(a) as obvious;
5. Pallakoff, Ishihara, and Liebenow do not render claim 4 unpatentable under 35 U.S.C. § 103(a) as obvious;

¹ 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. Pallakoff, Ishihara, and Armstrong do not render claim 7 unpatentable under 35 U.S.C. § 103(a) as obvious;
7. Pallakoff, Ishihara, and Willner do not render claim 11 unpatentable under 35 U.S.C. § 103(a) as obvious;
8. Pallakoff, Ishihara, and Hedberg do not render claims 13 and 14 unpatentable under 35 U.S.C. § 103(a) as obvious;
9. Secondary considerations show that the '313 patent's claims are not obvious;
10. Petitioner's Expert Declarations of Gregory F. Welch (Exhibits 1013 and 1042);
11. Response to arguments raised in Petitioner's Reply;
12. Response to any issues specified by Petitioner in its request for oral argument; and
13. 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/

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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.

Lead Counsel	Back-Up Counsel
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