

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. IPR2015-00476
Patent No. 7,218,313

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's June 22, 2015 Scheduling Order (Paper 12), Petitioner respectfully requests oral argument for the trial currently scheduled on January 19, 2016. Petitioner notes that oral argument for this IPR is scheduled on the same date as the oral argument for IPR2015-00229, IPR2015-00230, IPR2015-00396, and IPR2015-00533, for which Petitioner is filing similar requests for oral argument. Due to overlap between these proceedings and in the interests of conserving the Board's resources, Petitioner requests at least 30 minutes and no less than the time granted to Patent Owner. Pursuant to 37 C.F.R. § 42.70(a), Petitioner specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

- I. Whether Claims 21-24, 26, 52-56, and 58 are Unpatentable Under 35 U.S.C. § 103 over Pallakoff in view of Liebenow;
- II. Whether Claim 27 is Unpatentable Under 35 U.S.C. § 103 over Pallakoff in view of U.S. Patent No. 6,469,691 to Armstrong;
- III. Whether Claims 28, 29, 59, and 60 are Unpatentable Under 35 U.S.C. § 103 over Pallakoff in view of Hedberg;
- IV. Whether Hedberg is Analogous Art; and
- V. Whether Patent Owner's Secondary Considerations Show Non-Obviousness.

U.S. Patent No. 7,218,313
IPR2015-00476

Dated: December 23, 2015

Respectfully submitted,
ERISE IP, P.A.

BY: /s/ Abran J. Kean
Eric A. Buresh, Reg. No. 50,394
Abran J. Kean, Reg. No. 58,540
6201 College Blvd., Ste. 300
Overland Park, KS 66211

ATTORNEYS FOR PETITIONER

**CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.6**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on December 23, 2015 the foregoing *Petitioner's Request for Oral Argument* was served via electronic filing with the Board on the following counsel of record for Patent Owner:

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 Ex. 101
Facsimile: (212) 529-5132
E-mail: mmauriel@mkwllp.com
skahn@mkwllp.com

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, Ste. 2200
Minneapolis, MN 55402
Telephone: (612) 373-0830
Facsimile: (612) 373-0929
E-mail: bgilbertson@greeneespel.com
sdunlop@greeneespel.com
kzhao@greeneespel.com

Dated: December 23, 2015

Respectfully submitted,
ERISE IP, P.A.

BY: /s/ Abran J. Kean
Eric A. Buresh, Reg. No. 50,394
Abran J. Kean, Reg. No. 58,540

ATTORNEYS FOR PETITIONER