

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY COMPUTER ENTERTAINMENT AMERICA LLC  
Petitioner

v.

APLIX IP HOLDINGS CORPORATION  
Patent Owner

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Case No. IPR2015-00533  
Patent No. 7,218,313

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

1. Petitioner cites no evidence of obviousness for claims 37-39 and 49;
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 '313 patent;
4. Pallakoff and Ishihara do not render claims 15 and 20 unpatentable under 35 U.S.C. § 103(a) as obvious;
5. Pallakoff, Ishihara, and Liebenow do not render claim 16 unpatentable under 35 U.S.C. § 103(a) as obvious;

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<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. Liebenow and Ishihara do not render claims 37-42, 46, and 49 unpatentable under 35 U.S.C. § 103(a) as obvious;
7. Liebenow and Armstrong do not render claims 44, 45, 47, and 48 unpatentable under 35 U.S.C. § 103(a) as obvious;
8. Liebenow and Hedberg do not render claims 50 and 51 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 1008 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.

<b>Lead Counsel</b>	<b>Back-Up Counsel</b>
<p>Eric A. Buresh (Reg. No. 50,394)  <a href="mailto:Eric.buresh@eriseip.com">Eric.buresh@eriseip.com</a></p> <p><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</p>	<p>Abran J. Kean (Reg. No. 58,540)  <a href="mailto:Abran.kean@eriseip.com">Abran.kean@eriseip.com</a></p> <p><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</p>

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