## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MAKO SURGICAL CORP., Petitioner

v.

BLUE BELT TECHNOLOGIES, INC., Patent Owner

> Case IPR2015-00629 Patent No. 6,757,582 B2

## PETITIONER MAKO SURGICAL CORP.'S REQUEST FOR ORAL ARGUMENT

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Pursuant to 37 C.F.R. § 42.70(a) and the Board's July 30, 2015 Scheduling Order, Petitioner Mako Surgical Corp. respectfully requests oral argument as currently scheduled for April 7, 2016. Petitioner requests an opportunity to address all issues raised in this matter in the Petition, the Patent Owner Response, and Petitioner's Reply, including:

- The proper construction of "track" and "tracking;"
- The anticipation of claims 1, 5, 6, 8, 9, 13, 14, 16, 17, 21–30, 34–42, 47, and 50–58 by the Taylor prior art reference;
- The obviousness of claim 3 in light of the Taylor prior art reference combined with the Glassman reference and the motivation to combine the references;
- The obviousness of claims 48 and 49 in light of the Taylor prior art reference combined with the Delp reference and the motivation to combine the references;
- The obviousness of claim 7 in light of the Taylor prior art reference combined with the DiGioia reference and the motivation to combine the references; and
- The obviousness of claim 11 in light of the Taylor prior art reference.
  Mako also requests an opportunity to present arguments on any issues raised

by the Patent Owner at Oral Argument, and any additional issues on which the

Board seeks information or clarification. Subject to the Board's approval, Mako may use appropriate demonstrative exhibits during the oral argument and such demonstrative exhibits will be served according to 37 C.F.R. § 42.70(b).

Dated: March 9, 2016

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Respectfully submitted,

By: /s/ Matthew I. Kreeger Matthew I. Kreeger Registration No. 56,398 **MORRISON & FOERSTER LLP** 425 Market Street San Francisco, California 94105-2482 Tel: (415) 268-6468 Fax: (415) 268-7522

> Attorney for Petitioner Mako Surgical Corp.

## Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the above captioned Request for Oral Argument was

served as of the below date via electronic mail by agreement on the Patent Owner

at the following correspondence address:

Brian M. Buroker **GIBSON, DUNN & CRUTCHER LLP** 1050 Connecticut Avenue, N.W. Washington, DC 20036-5306

Dated: March 9, 2016

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