

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. IPR2015-00729
Patent No. 7,280,097

**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 30, 2015 (Paper 14), Patent Owner respectfully requests one hour of oral argument, in

total, for the proceedings currently scheduled for hearing on March 30, 2016.¹

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

1. Petitioner cites no evidence of obviousness of claims 1, 10, 11, 13, 14, 16, 25, 26, 27, 36, 37, and 38;
2. Person of ordinary skill in the art;
3. Petitioner's obviousness case rests on non-analogous art;
4. Claim construction;
5. Mollinari and Nishiumi do not render claims 1-4, 7, 8, 13, 14, 16-18, 21, 23-29, 31, and 34-38 obvious;
6. Mollinari and Nishiumi should not be combined;
7. Even if wrongly combined, Mollinari and Nishiumi do not disclose claims 1-4, 7, 8, 13, 14, 16-18, 21, 23-29, 31, and 34-38;
8. Mollinari, Nishiumi, and Tu do not render claims 6, 22, and 32 obvious;
9. Kerr and Lum do not render claims 10-12 obvious;

¹ The Board has currently scheduled hearings for March 30, 2016, in both this proceeding and IPR2015-00730. Patent Owner requests one hour for its presentation regarding both proceedings affording each proceeding approximately 30 minutes.

10. Shima does not anticipate claims 5, 19, and 30;

11. Petitioner's Expert Declarations of Gregory F. Welch (Exhibits 1009 and 1039);

12. Reply to arguments raised in the Petitioner's Reply;

13. Response to any issues specified by Petitioner in its request for oral argument; and

14. 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: March 2, 2016.

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on this 2nd day of March 2016, the foregoing Patent Owner Aplix IP Holdings Corporation's Request for Oral Argument is being served via electronic filing with the Board on the on the following counsel of record for petitioner.

| Lead Counsel | Back-Up Counsel |
|---|--|
| <p>Eric A. Buresh (Reg. No. 50,394) Eric.buresh@eriseip.com</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) Abran.kean@eriseip.com</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> |

Dated: March 2, 2016.

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