

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC., SAMSUNG ELECTRONICS CO., LTD.,
Petitioner

v.

SUMMIT 6 LLC
Patent Owner

Case: IPR2015-00806¹
Patent No. 7,765,482 B2

Title: Web-Based Media Submission Tool

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

¹ Samsung Electronics Co., Ltd., who filed a Petition in IPR2016-00029, has been joined as a petitioner in the instant proceeding.

In accordance with 37 C.F.R. § 42.70(a), Patent Owner respectfully requests an opportunity to present oral argument before the Board. Oral argument is presently scheduled for May 18, 2016 in IPR2015-00806 relating to U.S. Patent No. 7,765,482 (“the ’482 patent”).² (*See* Order, Paper 36, p.2). As to the ’482 patent, Patent Owner anticipates addressing the following issues in its argument:

1. Whether challenged claims 12, 13, 16, 18, 19, 21–25, 35–38, 40–42, 44–46, and 49 are obvious under 35 U.S.C. § 103 over Creamer and Aihara in view of the differences between the challenged claims and the prior art, especially when viewed in light of the objective evidence of non-obviousness;
2. Whether challenged claims 12, 13, 16, 18, 19, 21–25, 35–38, 40–42, 44–46, and 49 are obvious under 35 U.S.C. § 103 over Mayle and Narayan in view of the differences between the challenged claims and the prior art, especially when viewed in light of the objective evidence of non-obviousness;
3. Reply to any arguments raised in Petitioner’s Petition and Reply;

² In addition, the Board has scheduled the oral hearing for May 18, 2016 in one other co-pending *inter partes* review proceeding, IPR2015-00807.

4. Respond to any issues specified by Petitioner in its request for oral argument;
5. Respond to Petitioner's presentation on all matters; and
6. Any additional issues on which the Board seeks clarification.

Lead counsel for Patent Owner met and conferred with lead counsel for Petitioner and the parties agree that the hearings in IPR2015-00806 and IPR2015-00807 could be concluded in one half-day session. Patent Owner requests 60 minutes collectively to present its arguments on both matters. Patent Owner also requests the ability to use audio-visual equipment to display demonstrative exhibits, including the use of a projector and screen for power point display.

Dated: April 6, 2016

Respectfully submitted,

/Peter J. Ayers/

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2016, the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70** was served on lead and back-up counsel for Petitioner by sending the same by electronic means to the address provided by Petitioner:

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