UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC. and MOTOROLA MOBILITY, LLC, Petitioners,

v.

GLOBAL TOUCH SOLUTIONS, LLC, Patent Owner

Case IPR2015-01175
Patent 8,288,952 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT



Patent Owner Global Touch Solutions, LLC. ("Global Touch Solutions") requests oral argument under 37 C.F.R. § 42.70 and the Board's Scheduling Order. Oral argument is currently scheduled for August 3, 2016.

Global Touch Solutions specifies the following issues to be argued, without intent to waive consideration of any allowable issue not requested or raised by Petitioners:

- 1. Claim construction of "user interface."
- 2. Claim construction of "energy consuming load."
- 3. Claim construction of "touch sensor functions"/"touch sensing functions."
- 4. Claim construction of "selection and activation of a function or mode of the product in response to a further activation signal(s) received from the user interface."
- 5. Claim construction of "a function that was activated in response to an activation signal, received from said user interface."
 - 6. Claim construction of "production functions."
- 7. Whether claims 1-3, 16, 17, 19, 22-24, 26, 27, and 38-40 are obvious over Beard in view of Rathmann.



8. Whether claims 4 and 14 are obvious over Beard in view of Rathmann and Danielson.

9. Petitioners are the party with the burden of proof and therefore will present first at the oral hearing. Global Touch Solutions also will address any issues raised by Petitioners, or questions raised by the Board during Petitioners' presentation.

Global Touch Solutions requests the ability to use an overhead projector or other audio-visual equipment for demonstrative exhibits such as PowerPoint slides.

Respectfully submitted, Global Touch Solutions, LLC

/Fadi N. Kiblawi/
William H. Mandir
Registration No. 32,156
wmandir@sughrue.com

Fadi N. Kiblawi Registration No. 61,973 <u>fkiblawi@sughrue.com</u>

Date: July 11, 2016



CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the attached Patent Owner's Request for Oral Argument and this Certificate of Service are being served on July 11, 2016 by electronic mail upon the following:

Robert Steinberg
Matthew J. Moore
Gabriel S. Gross
Phillip E. Morton
DeAnna Allen
Joseph M. Drayton
bob.steinberg@lw.com
matthew.moore@lw.com
gabe.gross@lw.com
pmorton@cooley.com
dallen@cooley.com
jdrayton@cooley.com

Date: July 11, 2016 Respectfully submitted,

/Fadi N. Kiblawi/ Fadi N. Kiblawi Registration No. 61,973

