

Case IPR2015-01364
Patent 6,101,534
Paper No. 19
Filed: June 16, 2016

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY COMPUTER ENTERTAINMENT AMERICA LLC,
Petitioner,

v.

ROTHSCHILD DIGITAL MEDIA INNOVATIONS, LLC,
Patent Owner.

Case IPR2015-01364
Patent 6,101,534

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Mail Stop: Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order (*see* Paper No. 9 at 7) as modified (*see* Paper No. 14 at 2), Patent Owner respectfully requests oral argument, which is currently scheduled for August 18, 2016.

The issues to be argued are those related to the grounds upon which inter partes review has been instituted, specifically:

- (1) claim construction, including the use of the terms “direct” and “indirect” in construing the claims, and the significance of the recitation that the auxiliary site addresses are structured to be remotely accessed so as to initiate utilization of auxiliary site data;
- (2) whether U.S. Patent No. 5,724,103 (“Batchelor”) constitutes non-analogous art with respect to the claimed inventions;
- (3) whether claims 1, 6-9, 21, 23 and 24 are obvious over U.S. Patent No. 5,892,825 (“Mages”) in view of Batchelor; and
- (4) whether claim 22 is obvious over Mages in view of Batchelor, in further view of U.S. Patent No. 5,736,977 (“Hughes”).

Patent Owner respectfully requests one hour of argument time.

Respectfully submitted,

Date: June 16, 2016

/Thomas K. Landry/

Thomas K. Landry, Lead Counsel

Registration No. 33,939

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**CERTIFICATE OF SERVICE
UNDER 37 C.F.R. §§ 42.6(e)**

Pursuant to 37 C.F.R. §§ 42.6(e), I certify that I caused to be served electronically by agreement of the parties on this 16th day of June 2016, a true and correct copy of the foregoing Patent Owner's Request for Oral Argument on counsel of record for Petitioner as follows:

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