

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc.,  
Ericsson Inc., and Telefonaktiebolaget LM Ericsson  
*Petitioners,*

v.

TracBeam, LLC,  
*Patent Owner.*

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Case IPR2015-01708  
Patent 7,525,484 B2

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

*Submitted Electronically via the Patent Review Processing System*

**PETITIONERS' REQUEST FOR ORAL ARGUMENT  
PURSUANT TO 37 C.F.R. § 42.70**

Pursuant to 37 C.F.R. § 42.70, the Board’s Scheduling Order (Paper No. 11), and the Petitioners’ and Patent Owner’s Stipulated Request to Amend the Schedule (Paper No. 12), T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc., Ericsson Inc., and Telefonaktiebolaget LM Ericsson (collectively, “Petitioners”) hereby request oral argument. The Board has already scheduled oral argument for November 8, 2016. *See* Scheduling Order (Paper No. 11) at 5, 7; *see also* Nov. 2016 PTAB Public Hearing Schedule (Oct. 12, 2016), [https://www.uspto.gov/sites/default/files/documents/ptab\\_nov16\\_101216.pdf](https://www.uspto.gov/sites/default/files/documents/ptab_nov16_101216.pdf).

Petitioners also request permission to use audio-visual equipment to display possible demonstrative exhibits.

Pursuant to 37 C.F.R. § 42.70(a), Petitioners specify the following issues to be argued in this proceeding:

**ISSUES TO BE ARGUED**

- A. The grounds on which the instant *inter partes* review proceeding was instituted, namely the unpatentability of Claim 1, over U.S. Patent No. 5,936,572 to Loomis in view of U.S. Patent No. 6,748,226 B1 to Wortham.
- B. Any issues specified by Patent Owner in a request for oral argument.
- C. Rebuttal to Patent Owner’s presentation on all matters.

Respectfully submitted,  
BAKER BOTTS L.L.P.  
Attorneys for Petitioner

A handwritten signature in black ink, appearing to read "B. W. Oaks", written in a cursive style.

Brian W. Oaks  
Reg. No. 44,981

Date: October 17, 2016

## CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 17th day of October, 2016, a complete and entire copy of this **PETITIONER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70** was served on Patent Owner via email at the following correspondence addresses:

- [sean@dovellaw.com](mailto:sean@dovellaw.com)
- [ssereboff@socalip.com](mailto:ssereboff@socalip.com)

CERTIFICA



October 17, 2016

Date

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