

Filed on behalf of Petitioner

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Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX CORPORATION,
Petitioner,

v.

APPLICATIONS IN INTERNET TIME, LLC,
Patent Owner.

Case No. IPR2015-01752
Patent No. 7,356,482

**PETITIONER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)**

Petitioner, RPX Corporation, by and through its attorneys, respectfully requests oral argument, currently scheduled for November 8, 2016. Given the overlap of issues between this proceeding and related cases IPR2016-01750 and IPR2016-01751, Petitioner requests that the oral arguments for the proceedings be merged and conducted as a consolidated hearing. Petitioner requests a total of 90 minutes to present its arguments for all three cases, and requests the ability to move between the cases during its argument, as well as to reserve a portion of its total time for presenting rebuttal arguments after Patent Owner's presentation.

Pursuant to 37 C.F.R § 42.70, and without intending to waive any issue not specifically identified, Petitioner specifies the following issues to be argued:

1. Proper construction of the claimed “automatically detecting changes that affect an application;”
2. Anticipation of claim 22 under 35 U.S.C. § 102(e) by Popp under both Petitioner's and Patent Owner's constructions;
3. Obviousness of claims 3–6 and 23–26 under 35 U.S.C. § 103(a) in view of Popp and Cobb under both Petitioner's and Patent Owner's constructions;
4. Obviousness of claim 22 under 35 U.S.C. § 103(a) in view of Balderrama and Java Complete under both Petitioner's and Patent Owner's constructions;

5. Obviousness of claims 3–6 and 23–26 under 35 U.S.C. § 103(a) in view of Balderrama, Java Complete, and Codd under both Petitioner’s and Patent Owner’s constructions;

6. Obviousness of claims 3–6 and 23–26 under 35 U.S.C. § 103(a) in view of Kovacevic and Codd under both Petitioner’s and Patent Owner’s constructions;

7. Real party-in-interest;

8. Any issue identified in Patent Owner’s Request for Oral Argument;

9. Any other issues raised in papers yet to be filed, such as Motions to Exclude; and

10. Any other issues the Board deems necessary to consider for issuing a Final Written Decision.

Petitioner requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector to be connected to a laptop and a screen for displaying documents.

Dated:

Respectfully submitted,
RPX Corporation

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

I certify that on this 3rd day of October, 2016, I will cause a copy of the foregoing document to be served via electronic mail, as previously consented to by Patent Owner, upon the following counsel of record:

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Date: October 3, 2016

/MacAulay Rush /
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