

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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COXCOM, LLC

Petitioner,

v.

JOAO CONTROL & MONITORING SYSTEMS, LLC

Patent Owner

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Case IPR2015-01760

Patent 6,549,130

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70 and the Board's February 17, 2016 Scheduling Order (Paper 9), Patent Owner Joao Control & Monitoring Systems, LLC respectfully requests oral argument, which is currently scheduled for November 17, 2016, on the issues raised in the Petition for *Inter Partes* Review of U.S. Patent 6,549,130 ("the '130 Patent"), Patent Owner's Preliminary Response, the Decision to Institute, Patent Owner's Response, Petitioner's Reply to Patent Owner's Response, Motions for Observations on Cross Examination and any Responses (if filed), and any Motions to Exclude and corresponding Oppositions and Replies (if filed). The issues to be argued include:

- The '130 Patent's entitlement to a priority date of March 27, 1996;
- The disqualification of the Koether and Crater references as prior art based on the March 27, 1996 priority date;
- CoxCom's failure to name all the real parties-in-interest in the present IPR;
- The Petition being time-barred with respect to real parties-in-interest Terremark and Time Warner;

- Koether's failure to disclose, teach or suggest a "second control device" which is "located at a location remote from the premises;" and
- Koether's failure to disclose, teach or suggest transmitting a "first signal" from a "first control device" to the premises system/device via a "wireless device."

Patent Owner requests the ability to use audio visual equipment to display possible demonstratives and exhibits, including the use of a projector and screen.

Date: October 3, 2016

Respectfully submitted,  
**Sinergia Technology Law Group, PLLC**

BY: /René A. Vazquez/  
Counsel for Patent Owner

**CERTIFICATION OF SERVICE**

I hereby certify service of the foregoing Patent Owner's Request for Oral Argument on October 3, 2016 via electronic service at:

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Date: October 3, 2016

Respectfully submitted,  
**Sinergia Technology Law Group, PLLC**

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