

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COXCOM, LLC

Petitioner,

v.

JOAO CONTROL & MONITORING SYSTEMS, LLC

Patent Owner

Case IPR2015-01762

Patent 7,397,363

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's February 22, 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 7,397,363 ("the '363 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 '363 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;

- How the X.25 Protocol used by Koether teaches away from combining Koether and Crater; and
- Koether and Crater's failure to disclose, teach or suggest determining whether an action or operation is an authorized or allowed action or operation.

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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