

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.
Petitioner,

v.

WEST VIEW RESEARCH, LLC,
Patent Owner.

Case IPR2015-01941
Patent 8,065,156

**PATENT OWNER WEST VIEW RESEARCH, LLC'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

I. Pursuant to the Board's March 23, 2016 Scheduling Order (Paper 8), Patent Owner West View Research, LLC respectfully requests oral argument pursuant to 37 C.F.R. § 42.70, currently scheduled for December 1, 2016. Patent owner requests oral argument on all of the instituted grounds of unpatentability of claims 11, 15, and 22 of U.S. Patent No. 8,065,156 under 35 U.S.C. § 103(a). Specifically and without limitation, the following issues are to be argued:

A. Whether any portions of the sole independent claim (Claim 10) of the '156 Patent (and accordingly one or more claims depending therefrom) should be interpreted under 35 U.S.C. § 112, ¶ 6, and petitioners alleged failure to provide any structural analysis therefor.

B. Petitioner's alleged presumption and use of allegedly unreasonable claim constructions, including those relating to "digitized representations."

C. Petitioner's proposed reasons for combining the teachings of the references allegedly relying on impermissible hindsight.

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Patent Owner requests no more than one hour per side of oral argument time.

Respectfully submitted,

Dated: October 24, 2016

/Peter J. Gutierrez, III/

Peter J. Gutierrez, III

Reg. No. 56,732

Attorney for Patent Owner

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

The undersigned hereby certifies that the foregoing **PATENT OWNER WEST VIEW RESEARCH, LLC'S REQUEST FOR ORAL ARGUMENT** was served electronically via e-mail on October 24, 2016, in their entirety on the following counsel of record for Petitioners:

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Date: October 24, 2016

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