

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PLAID TECHNOLOGIES, INC.,  
Petitioner,

v.

YODLEE, INC.,  
Patent Owner.

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IPR2016-00273  
U.S. Patent No. 6,317,783

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a), Petitioner Plaid Technologies, Inc. (“Petitioner”) hereby respectfully requests oral argument in the present *inter partes* review proceeding. Petitioner specifies the following issues to be argued:

- Whether claims 1, 3–20, and 22–36 of U.S. Patent No. 6,317,783 (“the ’783 patent”) are unpatentable under 35 U.S.C. § 103(a) as obvious over the combination of Sugiarto (Ex. 1004) and Brandt (Ex. 1005);
- Whether claims 2 and 21 of the ’783 patent are unpatentable under 35 U.S.C. § 103(a) as obvious over the combination of Sugiarto (Ex. 1004), Brandt (Ex. 1005), and Chow (Ex. 1006);
- The appropriate constructions to be given to the disputed claim terms;
- Whether the claim term “non-public personal information” should be given patentable weight;
- Whether a person of ordinary skill in the art would have been motivated to combine Sugiarto (Ex. 1004), Brandt (1005), and Chow (1006) and would have had at least a reasonable expectation of successfully doing so;
- Response to any issues specified by Patent Owner in its request for oral argument;

- Response to Patent Owner's presentation on all matters; and
- Any other issue briefed or presented by the parties throughout this trial.

Petitioner requests 30 minutes of argument time. Petitioner proposes that Petitioner present argument, Patent Owner follow with its response, and that Petitioner use its remaining time for rebuttal.

Dated: January 30, 2017

Respectfully submitted,

By: /Brian M. Buroker/

Brian M. Buroker (Reg. No. 39,125) (lead)

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*Attorney for Petitioner Plaid Technologies,  
Inc.*

## CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. § 42.6(e) of a copy of this Request for Oral Argument by electronic mail on January 30, 2017, on the counsel of record of the Patent Owner:

David Hoffman, IPR12233-0047IP1@fr.com,

David M. Barkan, barkan@fr.com,

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DATED: January 30, 2017

By: /Brian M. Buroker/

Brian M. Buroker (Reg. No. 39,125)

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