

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC., HTC CORPORATION, AND HTC AMERICA, INC.,  
Petitioners

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,  
Patent Owner

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Case IPR2016-00923<sup>1</sup>  
Patent No. 5,812,789

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**PETITIONERS' REQUEST FOR ORAL HEARING**

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<sup>1</sup> Case No. IPR2016-00847 has been joined with this proceeding

In accordance with 37 C.F.R. § 42.70(a), Petitioners Apple Inc., HTC Corporation, and HTC America, Inc. hereby request an oral hearing in the present *inter partes* review. The issues to be argued include:

1. Lambrecht anticipates each and every element of claims 1, 3, 5, 11, and 13 including:
  - a. a decoder that accesses memory sufficient to maintain real time operation; and
  - b. a “shared bus” having sufficient bandwidth to enable a decoder to access the memory and operate in real time when another device simultaneously accesses the bus.
2. Other issues raised in papers filed in the present proceeding, including issues raised in any papers filed between today and the oral hearing.

In light of these remarks, Petitioners respectfully request the opportunity to present oral arguments before the Board on May 18, 2017. *See* Scheduling Order, Paper No. 11 at 3, 6.

Petitioners suggest a single consolidated oral argument for IPR2016-00923 and IPR2016-00924. These proceedings involve the same counsel, experts, and litigation proceedings. Additionally, because of the similar subject matter, the parties have previously sought to consolidate conducting depositions of each of the

party's respective expert. Petitioners have conferred with Patent Owner's counsel and Patent Owner's counsel is not opposed to consolidating the oral arguments. Petitioners therefore propose that each side be allocated a total of one hour to present oral arguments for IPR2016-00923 and IPR2016-00924 in a consolidated proceeding. Petitioners respectfully request the scheduling of a morning session, if available.

If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference. No fees are believed to be required for filing this request; however, the Commissioner is authorized to charge any required fees, or credit any overpayment, to Haynes and Boone, LLP's Deposit Account No. 08-1394.

Respectfully submitted,

Dated: April 14, 2017

/Andrew S. Ehmke/  
Andrew S. Ehmke  
Lead Counsel for Petitioners  
Registration No. 50,271

HAYNES AND BOONE, LLP  
Customer No. 27683  
Telephone: 214/651-5116  
Facsimile: 214/200-0853

**CERTIFICATE OF SERVICE**

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on Patent Owner as detailed below.

*Date of service* April 14, 2017

*Manner of service* Electronic Mail to: manjom@azalaw.com  
aalavi@azalaw.com; sclark@azalaw.com;  
mmcbride@azalaw.com

*Documents served* Petitioners' Request for Oral Hearing;

*Persons served* Masood Anjom  
Amir Alavi  
Scott Clark  
Michael McBride  
AHMAD, ZAVITSANOS, ANAIPAKOS, ALAVI &  
MENSING P.C.  
1221 McKinney, Suite 2500  
Houston, TX 77010

Dated: April 14, 2017

Respectfully submitted,

/Andrew S. Ehmke/  
Andrew S. Ehmke  
Registration No. 50,271