

Filed on behalf of TQ Delta, LLC
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.
Petitioner,

v.

TQ DELTA, LLC
Patent Owner

Case No. IPR2016-01009
Patent No. 8,238,412

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Patent Owner's Request for Oral Argument
IPR2016-01009

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner TQ Delta, LLC requests oral argument on the following:

- (1) all instituted grounds for review, including whether the challenged claims are obvious in view of Milbrandt, Chang, Hwang and ANSI T1.413-1995 according to the arguments and evidence properly raised in the Petition, Patent Owner Response, Reply, and Patent Owner Motion for Observation;
- (2) Patent Owner Motion to Exclude (which is being filed concurrently with this paper); and
- (3) Patent Owner's listing (Paper No. 20) of new arguments raised and new evidence cited in Petitioners' Reply.

Patent Owner requests that oral argument for IPR2016-01006, IPR2016-01007, IPR2016-01008 and IPR2016-01009 be consolidated, since there are issues common to these proceedings. However, because the four proceedings and three challenged patents have certain unrelated and unique issues, Patent Owner requests **60** minutes per side. Addressing three patents in one oral argument will increase efficiency; however, it will require additional time than is typically allocated to a challenge directed to a single patent.

Patent Owner's Request for Oral Argument
IPR2016-01009

Dated: July 5, 2017

Respectfully submitted,

/ Peter J. McAndrews/

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served on July 5, 2017 via electronic mail to counsel for Petitioner at the following:

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