

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FACEBOOK INC.  
Petitioner  
v.

WINDY CITY INNOVATIONS, LLC  
Patent Owner

U.S. Pat. No. 8,694,657  
Issue Date: April 8, 2014  
Title: REAL TIME COMMUNICATIONS SYSTEM

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Case No. IPR2016-01155<sup>1</sup>

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<sup>1</sup> Case IPR2017-00622 has been joined to this proceeding.

Pursuant to the Board's revised scheduling order (Paper 42) entered in IPR2016-01155, Patent Owner Windy City Innovations LLC respectfully requests oral argument, currently scheduled for October 19, 2017. Patent Owner requests sixty (60) minutes to present its arguments. Pursuant to 37 C.F.R. 42.70, and without intending to waive any issue not specifically identified, Patent Owner identifies the following issues to be argued:

1. whether claims of claims 1, 2, 18, 27, 35, 43, 51, 65, 79, 93, 100, 108, 114, 126, 138, 150, 156, 168, 170, 172, 176, 178, 180, 182–90, 202, 208, 214, 220, 226, 238, 250, 262, 268, 274, 280, 292, 304, 316, 322, 328, 334, 336, 340, 342, 344, 346, 348, 350, 352–54, 362, 366, 370, 374, 378, 386, 394, 402, 406, 410, 414, 422, 430, 438, 442, 450, 452, 454, 456, 458, 460, 462, 464–66, 476, 481, 486, 491, 496, 505, 515, 525, 530, 535, 545, 555, 565, 570, 580, 582, 584, 586, 588, 590, 592, 594, 596–98, 606, 607, 615–17, 619, 621, 622, 624–26, 628, 630, 632–34, 636, 638, 640–42, 644, 646, and 648–71 of U.S. Patent No. 8,694,657 B1 are unpatentable based on the instituted grounds which are authorized for trial;
2. any subsidiary issues to issue 1 above, including but not limited to claim construction, assessment of evidence, and admissibility and sufficiency of evidence;

3. any issues specified by Petitioner in its Request for Oral Argument; and
4. any other issues the Board deems necessary for issuing a final written decision.

Patent Owner respectfully requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector and a screen configured to display documents from a laptop computer.

Respectfully submitted,

Dated August 2, 2017

/Peter Lambrianakos \_\_\_\_\_ /

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**CERTIFICATE OF SERVICE**

A copy of PATENT OWNER'S REQUEST FOR ORAL ARGUMENT has been served on Petitioner at the correspondence of the Petitioner as follows:

<p><b>By Email:</b></p> <p>Heidi L. Keefe (Reg. No. 40,673) hkeefe@cooley.com zpatdcdocketing@cooley.com COOLEY LLP ATTN: Patent Group 1299 Pennsylvania Ave., NW, Suite 700 Washington, DC 20004</p>	<p><b>By Email:</b></p> <p>Phillip E. Morton (Reg. No. 57,835) pmorton@cooley.com zpatdcdocketing@cooley.com COOLEY LLP ATTN: Patent Group 1299 Pennsylvania Ave., NW, Suite 700 Washington D.C. 20004</p>
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August 2, 2017

By: /Peter Lambrianakos/

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