

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Juniper Networks, Inc., Ruckus Wireless, Inc., Brocade Communication
Systems, Inc., and Netgear, Inc.,
Petitioners

v.

ChriMar Systems, Inc.,
Patent Owner

Case No. IPR2016-01399

U.S. Patent No. 8,902,760

PETITIONERS' REQUEST FOR ORAL HEARING

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

U.S. Patent No. 8,902,760
Case No. IPR2016-01399

Pursuant to 37 C.F.R. § 42.70(a), Petitioners Juniper Networks, Inc., Ruckus Wireless, Inc., Brocade Communication Systems, Inc., and Netgear, Inc.

(“Petitioners”) request an oral hearing in IPR Nos. IPR2016-01389; IPR2016-01391; IPR2016-01397; and IPR2016-01399. The Board has set Due Date 7 for August 31, 2017 (at 1 PM ET) for these IPRs. Paper No. 19 at 3. Petitioners request (without any intent to waive consideration of any issue not requested) for a total of 120 minutes for the Petitioners to address at the oral hearing for these IPRs the following issues:

1. The unpatentability of claims 31, 35, 36, 40, 43, 52, 55, 56, 59, 60 and 65 of U.S. Patent No. 8,155,012 in view of the references relied upon in the Petition in IPR2016-01389;
2. The unpatentability of claims 1, 5, 31, 43, 70, 72, 74, 75, 83, 103, 104, 111, 123, and 125 of U.S. Patent No. 8,942,107 in view of the references relied upon in the Petition in IPR2016-01391;
3. The unpatentability of claims 1, 2, 7, 26, 29, 38, 39, 40, 47, 55, and 69 of U.S. Patent No. 9,019,838 in view of the references relied upon in the Petition in IPR2016-01397;
4. The unpatentability of claims 1, 31, 37, 59, 69, 72, 73, 106, 112, 134, 142, and 145 of U.S. Patent No. 8,902,760 in view of the references relied upon in the Petition in IPR2016-01399;

U.S. Patent No. 8,902,760
Case No. IPR2016-01399

5. The Petitioners' motion to exclude;
6. Responses to any issues specified by Patent Owner; and
7. Any additional issues on which the Board seeks clarification.

Petitioners request the ability to use audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint display. In accordance with the Trial Practice Guide, 77 Fed. Reg. at 48768, Petitioners will contact the Board Trial Division paralegal to discuss this request.

Date: July 28, 2017

Respectfully submitted,

/s/ Talin Gordnia

Talin Gordnia (Reg. No. 76,214)

Talin Gordnia, Reg. No. 76,214

tgordnia@irell.com

Michael Fleming, Reg. No. 67,933

mfleming@irell.com

Jonathan Kagan, *pro hac vice*

jkagan@irell.com

IRELL & MANELLA, LLP

1800 Avenue of the Stars, Suite 900

Los Angeles, CA 90067

Telephone: (310) 277-1010

Fax: (310) 203-7199

Nima Hefazi, Reg. No. 63,658

nhefazi@irell.com

IRELL & MANELLA, LLP

840 Newport Center Drive, Suite 400

Newport Beach, CA 92660

Telephone: (949) 760-0991

Fax: (949) 760-5200

U.S. Patent No. 8,902,760
Case No. IPR2016-01399

*Attorneys for Petitioner
Juniper Networks, Inc.*

U.S. Patent No. 8,902,760
Case No. IPR2016-01399

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. sections 42.6, that a complete copy of the **PETITIONERS' REQUEST FOR ORAL HEARING** is being served on July 28, 2017, pursuant to the parties' service agreement, via electronic mail to:

Richard W. Hoffman
Reising Ethington PC
755 West Big Beaver Road Suite 1850
Troy, Michigan 48084
Direct: 248.786.0163
Fax: 248.689.4071
Hoffmann@reising.com

Frank A. Angileri
Thomas A. Lewry
Marc Lorelli
Christopher C. Smith
Brooks Kushman P.C.
1000 Town Center Twenty-Second Floor
Southfield, MI 48075-1238
Phone: (248) 358-4400
Fax: (248) 358-3351
CHRMCO110IPR1@brookskushman.com

/s/ Susan M. Langworthy

Susan M. Langworthy