

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner

v.

TQ DELTA, LLC,
Patent Owner

Case IPR2016-01760
Patent 9,094,268

PETITIONER'S REQUEST FOR ORAL HEARING

In accordance with 37 C.F.R. § 42.70(a), Petitioner hereby requests an oral hearing in the present *inter partes* review. Per the Board's Scheduling Order, the oral hearing is scheduled for November 8, 2017. *See* Order, Paper 10, at 8.

1. Request to Consolidate Cases for Oral Hearing

The schedule in this case is aligned with the schedule of IPR2016-01466 such that the oral hearing in both cases is set for the same date. *See* Order, Paper 10, at 8; IPR2016-01466, Order, Paper 8, at 8. Because of overlapping subject matter and issues in both cases, and to expedite the proceedings, Petitioner respectfully requests a *single* consolidated oral hearing, with each side having **30 minutes** to present.

2. Issues to be Presented During Oral Hearing

During the oral hearing, Petitioner requests the opportunity to present oral argument on all of the issues raised in the papers pertaining to the instituted grounds, including:

- The combination of Bowie and Yamano rendering obvious the limitation “*a transmitter portion of the transceiver does not transmit data... and a receiver portion of the transceiver receives data*”;
- The combination of Bowie and Yamano rendering obvious the limitation “*maintaining synchronization with a second transceiver during the low power mode*”;

- Bowie disclosing the limitation “*storing, during the low power mode, at least one parameter associated with a full power mode*”; and
- Combining the teachings of Bowie and Yamano would have been obvious to a POSITA.

3. Conclusion

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,

October 2, 2017

/David L. McCombs/
David L. McCombs
Counsel for Petitioner
Registration No. 32,271

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.205, that service was made on the Patent Owner as detailed below.

Date of service October 2, 2017

Manner of service Email: pmcandrews@mcandrews-ip.com;
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Documents served Petitioner's Request for Oral Hearing

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