

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

APPLE, INC.,  
Petitioner,

v.

PAPST LICENSING GMBH & CO., KG,  
Patent Owner.

---

Case IPR2016-01864  
Patent 6,470,399

---

---

**NOTICE OF PATENT OWNER PAPST LICENSING GMBH & CO., KG'S  
REQUEST FOR ORAL ARGUMENT**

---

Pursuant to 37 C.F.R. § 42.70(a) and in accordance with the Scheduling Order of April 17, 2017 (Paper 14), Patent Owner hereby requests oral argument in this proceeding. Patent Owner requests that each side be given forty-five (45) minutes to present all arguments related to IPR2016-01842, IPR2016-01860, IPR2016-01863 and IPR2016-01864 which involve United States Patent No. 9,189,437 (“437 Patent”), United States Patent No. 8,966,144 (“144 Patent”), United States Patent No. 8,504,746 (“746 Patent”) and United States Patent No. 6,470,399 (“399 Patent”), respectively. Because all of these patents have similar limitations and a common specification and because the same primary reference (“Pucci”) has been applied in all of these proceedings, Patent Owner submits that these proceedings should be argued together.

Patent Owner believes oral argument would be beneficial to discuss whether the claims of the ‘437 Patent, ‘144 Patent, ‘746 Patent and ‘399 Patent would have been obvious over the cited prior art and proper claim construction of disputed terms of these patents. Patent Owner further believes oral argument would be beneficial to respond to any arguments raised in Petitioner’s original petitions and replies and to discuss any other issues or matters that arise during Petitioner’s presentation at oral argument or that have arisen previously during this proceeding.

Date: December 5, 2017

Respectfully Submitted,

/s/ Gregory S. Donahue  
Gregory S. Donahue  
Reg. No. 47,531  
DiNovo Price LLP  
7000 North MoPac Expressway  
Suite 350  
Austin, TX 78731  
Telephone: (512) 539-2625  
Facsimile: (512) 539-2627

*Lead Counsel for Patent Owner Papst  
Licensing GMBH & Co., KG*

Michael R. Fleming  
Reg. No. 67,933  
mfleming@irell.com  
Irell & Manella LLP  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Telephone: (310) 277-1010  
Facsimile: (310) 203-7199

*Back-Up Counsel for Patent Owner  
Papst Licensing GMBH & Co., KG*

CERTIFICATE OF SERVICE

I hereby certify that on this 5<sup>th</sup> day of December 2017, a true and correct copy of the foregoing NOTICE OF PATENT OWNER PAPST LICENSING GMBH & CO. KG'S REQUEST FOR ORAL ARGUMENT was served by electronic mail upon the following counsel of record for Apple, Inc.:

Lori A. Gordon  
Steven W. Peters  
Tyler J. Dutton  
STERNE, KESSLER, GOLDSTEIN & FOX  
1100 New York Avenue, N.W.  
Washington, D.C. 20005  
lgordon-ptab@skgf.com  
speters-ptab@skgf.com  
tdutton-ptab@skgf.com  
ptab@skgf.com

*/s/ Gregory S. Donahue*

---

Gregory S. Donahue  
Reg. No. 47,531  
DiNovo Price LLP  
7000 North MoPac Expressway  
Suite 350  
Austin, Texas 78731