

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALVE CORPORATION

Petitioner,

v.

IRONBURG INVENTIONS LTD.

Patent Owner.

IPR2017-00136 (Patent 8,641,525 B2)

IPR2017-00137 (Patent 9,089,770 B2)

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

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

Subject to the Board's anticipated decision on the pending Motion to Terminate (Paper 26) for IPR2017-00136 and IPR2017-00137, and pursuant to the Board's May 4, 2017 Scheduling Order (Paper 11) and the parties' August 11, 2017 Joint Stipulated Schedule Change (Paper 18), Patent Owner Ironburg Inventions Ltd. ("Patent Owner") respectfully requests oral argument, which is currently scheduled for December 4, 2017. Patent Owner requests a combined argument and transcript for IPR2017-00136 and IPR2017-00137 because the oral arguments overlap in substance and are both scheduled for the same day with the same panel.

Without waiving consideration of any issue not identified below, Patent Owner requests a 1PM ET start time and three hours (90 minutes per side) to address the following issues in both IPR2017-00136 and IPR2017-00137:

1. The construction of certain terms of (a) U.S. Pat. No. 8,641,525 ("the '525 Patent"), which is the subject of the IPR2017-00136 proceeding, and (b) U.S. Pat. No. 9,089,770 ("the '770 Patent"), which is the subject of the IPR2017-00137 proceeding;
2. For IPR2017-00136, the patentability of challenged claim 20 of the '525 Patent over the Wörn reference.
3. For IPR2016-00949, the patentability of the challenged claims 1-4, 12, 15-18 and 20 of the '770 Patent over the Wörn reference.

4. Any new issues raised in Petitioner's Reply that exceed the proper scope of a reply;
5. Any issues specified by Petitioner in its Request for Oral Argument;
6. Rebuttal to Petitioner's presentation on all matters;
7. Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and
8. Any other outstanding motions and pleading, and other issues that the Board deems necessary for issuing a Final Written Decision.

Patent Owner requests the ability to use audio visual equipment to display possible demonstratives and exhibits, including the use of a computer, projector, Elmo, and screen.

Date: October 30, 2017

Respectfully submitted,

By: /s/ Ehab M. Samuel
Ehab Samuel, Reg. No. 57,905
Yasser El-Gamal, Reg. No. 45,339
MANATT, PHELPS & PHILLIPS, LLP

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**, was served electronically via PTAB E2E to Petitioner's counsel of record at the following address:

Joshua C. Harrison, Reg. No. 45,686, josh@bhiplaw.com
Reynaldo C. Barcelo, Reg. No. 42,290, rey@bhiplaw.com

Date: October 30, 2017

Respectfully submitted,

By: /s/ Ehab M. Samuel
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