

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., FACEBOOK, INC., and WHATSAPP, INC.,
Petitioners,

v.

UNILOC LUXEMBOURG S.A.,
Patent Owner.

Case IPR2017-00222¹
Patent 8,243,723

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Patent Owner Uniloc Luxembourg S.A. hereby requests oral argument pursuant to 37 C.F.R. §42.70 and the Scheduling Order (Paper 10) in this proceeding. Oral Argument is currently scheduled for February 8, 2018. Notably, the Board scheduled the oral argument for this matter and two related matters concerning the same parties and the same family of patents on the same day. *See* IPR2017-00221 (U.S. Patent No. 7,535,890) and IPR2017-00225 (U.S. Pat. No.

¹ Facebook, Inc. and WhatsApp, Inc., who filed a petition in IPR2017-01635, have been joined as petitioners in this proceeding.

8,995,433). These three related are highly related and concern similar terms set forth within the same specification of this single family of patents. In addition, these matters concern overlapping references cited by the Petitioners. Patent Owner further notes that the parties previously agreed that it was appropriate to combine all three matters for purposes of the depositions taken during trial. Accordingly, Patent Owner submits it is appropriate to schedule a single oral argument for these three related matters.

Patent Owner notes that Scheduling Order states “The parties are advised that oral argument, if requested, will be held in the Texas Regional Office in Dallas, TX.” Patent Owner requests that the oral argument be held at the Texas Regional Office, which is proximate to Patent Owner’s headquarters and its counsel.

Patent Owner requests no more than 45 minutes per side of oral argument time in total for all three related matters. Patent Owner also requests permission to use audiovisual display equipment to present demonstratives, including a projector and screen for computer-generated slides, and a document camera/projector. Patent Owner expects to have three or four people at the hearing.

Issues to be argued include:

1. Any issues pertaining to the grounds on which this IPR was instituted. This may include, for example, the level of ordinary skill in the art, claim construction, the absence of elements in the prior art, and reasons/motivations to combine references.
2. Any issues specified in the Petition.
3. Any issues specified in Patent Owner’s Response.

4. Any issues specified in Petitioner's Reply.
5. Any issues otherwise raised by the Board.

Date: January 4, 2018

Respectfully submitted,

By: /s/ Brett A. Mangrum

Brett A. Mangrum; Reg. No. 64,783
Ryan Loveless; Reg. No. 51,970
Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Request for Oral Argument was served on counsel of record by email.

Date: January 4, 2018

Respectfully submitted,

By: /s/ Brett A. Mangrum

Brett A. Mangrum; Reg. No. 64,783
Ryan Loveless; Reg. No. 51,970
Counsel for Patent Owner