

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner,

v.

VILOX TECHNOLOGIES LLC
Patent Owner

IPR2018-00044
Patent 7,302,423

PETITIONER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Petitioner hereby requests oral argument in the present *inter partes* review to be held on December 11, 2018 as set forth in the Scheduling Order. Paper 10 at 4, 6.

I. Issues to be Presented During Oral Argument

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

- how the combination of *Maloney* and *Bertram* renders obvious claims 1–4, 7–9, and 13 of the '423 Patent;
- how the combination of *Excel* and *Bertram* renders obvious claims 1–4, 7–9, and 13 of the '423 Patent;
- how the combination of *Maloney*, *Bertram*, and *Kanevsky* renders obvious claims 5 and 6;
- how the combination of *Excel*, *Bertram*, and *Kanevsky* renders obvious claims 5 and 6;
- how the proposed claims 24–27 lack written description support in the disclosure of the '423 Patent;
- how the combination of *Maloney* and *Bertram* renders obvious proposed claims 24 and 25;
- how the combination of *Excel* and *Bertram* renders obvious proposed claims 24 and 25;

- how the combination of *Maloney*, *Bertram*, and *Kanevsky* renders obvious proposed claims 26 and 27;
- how the combination of *Excel*, *Bertram*, and *Kanevsky* renders obvious proposed claims 26 and 27;
- how the combination of *Maloney*, *Bertram*, and *Goldberg* renders obvious proposed claims 26 and 27;
- how the combination of *Excel*, *Bertram*, and *Goldberg* renders obvious proposed claims 26 and 27;
- how *Excel* and *Goldberg* are prior art to the '423 patent;
- motions to exclude (if any); and
- any responses to issues raised by the Board at the argument.

Dated: November 2, 2018

Respectfully submitted,

By: /David M. O'Dell/
David M. O'Dell
Registration No. 42,044
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6, this is to certify that a true and correct copy of the foregoing "*Petitioner's Request for Oral Argument*" service was made on the Patent Owner as detailed below:

Date of service November 2, 2018

Manner of service Email: harrop@vapatent.com

Documents served Petitioner's Request for Oral Argument

Persons Served John K. Harrop
Cecil E. Key
Jay Kesan
P.O. Box 320171
Alexandria, VA 22320

440 Belmont Bay Drive, Unit 202
Woodbridge, VA 22191

By: /David M. O'Dell/
David M. O'Dell
Registration No. 42,044
Lead Counsel for Petitioner