

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

UNIFIED PATENTS INC.

*Petitioner*

v.

UNIVERSAL SECURE REGISTRY LLC

*Patent Owner*

---

Case IPR2018-00067

U.S. Patent No. 8,577,813

---

**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to the parties Notice of Joint Stipulation and Authorized Request to Modify Schedule, (Paper 40), Petitioner respectfully requests oral argument for the trial currently scheduled on January 30, 2019. Petitioner and Patent Owner have conferred and jointly propose that each side be allotted a total of forty-five (45) minutes per side for oral argument. Petitioner requests the opportunity to present oral argument on all issues raised in the papers, and identifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

- I. Whether claims 1, 2, 3, 5, 11, 13–17, 20, and 22–26 are obvious under §103(a) over the combination of U.S. Patent 6,016,476 to Maes, et al. (“*Maes*”) and U.S. Patent 5,870,723 to Pare, et al. (“*Pare*”);
- II. Whether claims 1, 2, 3, 5, 11–17, and 20–26 are obvious under §103(a) over the combination of *Maes* and U.S. Patent Publication 2004/0107170 A1 to Labrou, et al. (“*Labrou*”);
- III. Whether claims 12–15, 17, 20–23, 25, and 26 are obvious under §103(a) over the combination of *Maes*, *Pare*, and *Labrou*;
- IV. Whether claims 6-9 and 18 are obvious over the combination of *Maes*, *Pare*, and PCT Patent Publication WO 2001/024123 to Burger, et al. (“*Burger*”);
- V. Whether claims 6-9 and 18 are obvious over the combination of *Maes*, *Labrou* and *Burger*;

- VI. Whether claims 1-2, 5, 11, 13, 16-17 and 24 are obvious under §103(a) over U.S. Patent 7,865,448 to Pizarro (“*Pizarro*”) in view of *Pare*;
- VII. Whether Patent Owner’s contingently proposed amended claims 27-52 are patentable and should be allowed:
- a. Whether proposed amended claims 27-31, 37-44, and 46-52 are obvious under §103(a) over the combination of *Maes* and *Labrou*;
  - b. Whether proposed amended claims 27-31, 37-41, and 50-52 are obvious under §103(a) over the combination of *Maes*, *Labrou*, and U.S. Patent 5,280,527 (“*Gullman*”);
  - c. Whether proposed amended claims 27-31, 37-41, and 50-52 are obvious under §103(a) over the combination of *Maes*, *Labrou*, and U.S. Patent Publication 2004/0172535 (“*Jakobsson*”);
  - d. Whether proposed amended claims 42-43 and 46-49 are obvious under §103(a) over the combination of *Maes*, *Labrou*, and U.S. Patent 5,479,512 (“*Weiss*”)
  - e. Whether proposed amended claim 45 is obvious under §103(a) over the combination of *Maes*, *Labrou*, *Weiss*, and *Gullman*;
  - f. Whether proposed amended claim 45 is obvious over the combination of *Maes*, *Labrou*, *Weiss*, and *Jakobsson*;

- g. Whether proposed amended claims 32-36 are obvious under §103(a) over the combination of *Maes, Labrou, Gullman, and Burger*;
  - h. Whether proposed amended claims 32-36 are obvious under §103(a) over the combination of *Maes, Labrou, Jakobsson, and Burger*;
  - i. Whether proposed amended claim 44 is obvious under §103(a) over the combination of *Maes, Labrou, Weiss, and Burger*;
  - j. Whether the proposed amended claims 27-52 are unpatentable under 35 U.S.C. § 101;
- VIII. The proper construction of disputed claim terms, if any;
- IX. Whether Petitioner is the sole real-party-in-interest; and
- X. Response to any issues specified by Patent Owner in its papers and/or request for oral argument.

Date: January 5, 2019

Respectfully submitted,

/s/ Jason R. Mudd

Jason R. Mudd, Reg. No. 57,700

Roshan Mansinghani, Reg. No. 62,429

Eric A. Buresh, Reg. No. 50,394

Jonathan Stroud, Reg. No. 72,518

*ATTORNEYS FOR PETITIONER*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the foregoing PETITIONER'S REQUEST FOR ORAL ARGUMENT was served on January 5, 2019 by filing these documents with the Patent Trial and Appeal Board End to End System (PTAB E2E), as well as by e-mailing copies to attorneys of record, as follows:

- [jimglass@quinnemanuel.com](mailto:jimglass@quinnemanuel.com)
- [nimahefazi@quinnemanuel.com](mailto:nimahefazi@quinnemanuel.com)
- [chrismathews@quinnemanuel.com](mailto:chrismathews@quinnemanuel.com)
- [tigranguledjian@quinnemanuel.com](mailto:tigranguledjian@quinnemanuel.com)
- [richardlowry@quinnemanuel.com](mailto:richardlowry@quinnemanuel.com)
- [qe-usr-ipr@quinnemanuel.com](mailto:qe-usr-ipr@quinnemanuel.com)

Date: January 5, 2019

/s/ Jason R. Mudd

Jason R. Mudd, Reg. No. 57,700