

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APPLE INC.,  
Petitioner,

v.

UNILOC LUXEMBOURG, S.A.,  
Patent Owner

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Case IPR2018-00289  
Patent No. 8,872,646

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**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 January 24, 2019 as set forth in the Scheduling Order. Paper 8 at 9.

### **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 “glitch” is properly construed to include a datum that is outside of an acceptable range;
- how the combination of *Pasolini, Goldman, McMahan, and Mizell* renders obvious claims 1, 3, 5-7, 9-11, 13-15, 17, and 20 of the '646 Patent;
- how the combination of *Pasolini, Goldman, McMahan, Mizell, and Park* renders obvious claims 8, 16, and 18 of the '646 Patent;
- the outstanding motion to strike, filed September 19, 2018; and
- any responses to issues raised by the Board at the argument.

Respectfully submitted,

Dated: November 13, 2018  
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/Andrew S. Ehmke/  
Andrew S. Ehmke  
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**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 13, 2018

*Manner of service* Electronic Mail to:  
ryan@etheridgelaw.com  
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*Documents served* Petitioner's Request for Oral Argument

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