

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

UNILOC LUXEMBOURG S.A.

Patent Owner.

Case No. IPR2018-00294

U.S. Patent No. 6,736,759

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's May 21, 2018, Scheduling Order (Paper 8), Petitioner respectfully requests oral argument for the trial currently scheduled on January 23, 2019. Petitioner respectfully requests that the Oral Argument be held in Alexandria, Virginia. In support of this request, Petitioner notes that it has consecutive hearings in both this matter on January 23 and another matter involving the same parties on January 24 (IPR2018-289). The Oral Argument in the IPR2018-289 proceeding already has been set and is scheduled to take place in Alexandria, Virginia. (IPR2018-289, Paper 18). If the oral arguments for these two matters are set in different locations, Petitioner's in-house counsel runs the risk of being unable to attend one of these arguments. Conducting both oral arguments in Alexandria would alleviate any issues with travel and attendance.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner requests 45 minutes of total time and specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

- I. The proper construction of "displaying real-time data";
- II. Whether claims 1-7, 9, 12, 14, 17-22 and 26 are unpatentable under 35 U.S.C. § 103(a) over Fry and Newell;
- III. Whether claims 20 and 22-23 are unpatentable under 35 U.S.C. § 103(a) over Fry, Newell, and Arcelus;
- IV. Whether claims 9 and 29-32 are unpatentable under 35 U.S.C. § 103(a) over Fry, Newell and Richardson;

- V. Whether claim 32 is unpatentable under 35 U.S.C. § 103(a) over Newell, Richardson and Arcelus;
- VI. Whether claims 4, 13, 15, 16, and 27-28 are unpatentable under 35 U.S.C. § 103(a) over Fry, Newell and Chance;
- VII. Whether claims 24-25 are unpatentable under 35 U.S.C. § 103(a) over Fry, Newell and French;
- VIII. Whether claims 1-5, 8-12, 14, 17 and 19-26 are unpatentable under 35 U.S.C. § 103(a) over Vock and Arcelus;
- IX. Whether claim 6 is unpatentable under 35 U.S.C. § 103(a) over Vock, Arcelus, and Richardson;
- X. Whether claims 4, 13, 15, 16, and 27-28 are unpatentable under 35 U.S.C. § 103(a) over Vock, Arcelus and Chance;
- XI. The proposed definitions of a person having ordinary skill in the art;
- XII. Any issues specified in Patent Owner's Response; and
- XIII. Any issues otherwise raised by the Board.

Dated: December 12, 2018

ERISE IP, P.A.

BY: /s/ Adam P. Seitz

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ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on December 12, 2018, *Petitioner's Request for Oral Argument* was served via electronic service on the following counsel of record for Patent Owner:

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