## UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD \_\_\_\_\_\_

APPLE INC., SAMSUNG ELECTRONICS AMERICA, INC., HTC CORP., HTC AMERICA, INC., and LG ELECTRONICS, INC., Petitioner,

v.

UNILOC 2017 LLC, Patent Owner

Case IPR2018-00424<sup>1</sup> Patent No. 7,881,902 B1

PETITIONER'S REQUEST FOR ORAL ARGUMENT

<sup>&</sup>lt;sup>1</sup> HTC Corp., HTC America, Inc., and LG Electronics, Inc., who collectively filed a petition in IPR2018-01631, and Samsung Electronics America, Inc., who filed a petition in IPR2018-01653, have been joined as petitioner in this proceeding.



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 April 2, 2019 as set forth in the Scheduling Order. *See* Paper 8 at 7.

## 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:

- Mitchnik renders obvious each and every element of claims 1-2;
- The combination of Mitchnik and Sheldon renders obvious each and every element of claim 3;
- The combination of Mitchnick and Tanenhaus renders obvious each and every element of claim 4;
- The combination of Fabio and Pasolini renders obvious each and every element of claims 5-6 and 9-10;
- Other issues raised in papers filed in the present proceeding, including issues raised in any papers filed between today and the oral hearing.

Petitioner also requests that the oral hearing for this case, IPR2018-00424, be combined with the oral hearing for IPR2018-01028, which is also directed to the '902 patent. Petitioner further requests that each side be allocated a total of 30 minutes to present oral arguments for the combined oral hearing of IPR2018-00424 and IPR2018-01028.



If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference. No fees are believed to be required for filing this request; however, the Commissioner is authorized to charge any required fees, or credit any overpayment, to Haynes and Boone, LLP's Deposit Account No. 08-1394.

Dated: March 1, 2019

HAYNES AND BOONE, LLP 2323 Victory Avenue, Suite 700

Dallas, Texas 75219

Telephone: 214-651-5116 Facsimile: 214-200-0853 Respectfully submitted,

/Andrew S. Ehmke/
Andrew S. Ehmke
Lead Counsel for Petitioner
Registration No. 50,271



## **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 March 1, 2019

Manner of service Electronic Mail to: ryan@etheridgelaw.com;

brett@etheridgelaw.com; jim@etheridgelaw.com; jeff@etheridgelaw.com; sean.burdick@unilocusa.com

Documents served Petitioner's Request for Oral Argument

Persons Served Ryan Loveless

Brett Mangrum James Etheridge Jeffrey Huang

ETHERIDGE LAW GROUP

2600 E. Southlake Blvd., Ste 120-324

Southlake, Texas 76092

Sean D. Burdick UNILOC USA, INC.

7160 Dallas Parkway, Ste. 380

Plano, TX 75024

By: /Andrew S. Ehmke/

Andrew S. Ehmke

Lead Counsel for Petitioner Registration No. 50,271

