

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

UNIVERSAL SECURE REGISTRY, LLC,

Patent Owner.

Case IPR2018-00812

U.S. Patent No. 8,856,539

PETITIONER APPLE INC.'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's November 7, 2018 Scheduling Order (Paper No. 10) and January 31, 2019 email granting the joint stipulation modifying certain deadlines, Petitioner Apple Inc. ("Apple") respectfully requests oral argument currently scheduled on August 27, 2019. Petitioner requests the ability to use a computer, projector, and screen to display demonstrative exhibits. Petitioner requests 30 minutes per side for each of IPR2018-00812, CBM2018-00024, and CBM2018-00025, all of which are scheduled concurrently on August 27, 2019, for a total of 90 minutes per side for all three proceedings. Petitioner respectfully submits that the differences in claim scope between the two patents at issue in addition to the varied grounds and different prior art references relied upon among the IPR2018-00812, the CBM2018-00024, and the CBM2018-00025 proceedings warrant additional time over the 60 minutes per side allotted for oral hearing in IPR2018-00809, IPR2018-00810, and IPR2018-00813, arguments for which were heard on July 16, 2019 between the same parties as this proceeding.

Pursuant to 37 C.F.R. § 42.70, Apple specifies the following issues to be argued:

- I. Whether challenged claims 1-3, 16, 21-24, and 37-38 are unpatentable under 35 U.S.C. § 103(a) as obvious over Reber (Ex. 1131) and Franklin (Ex. 1132).

- II. Respond to any arguments raised in Patent Owner's Preliminary Response (Paper No. 8), Patent Owner's Response (Paper No. 22) and Patent Owner's Sur-Reply (Paper No. 33).
- III. Whether substitute claims 39-47 are unpatentable under 35 U.S.C. § 103(a) as obvious over Reber (Ex. 1131), Franklin (Ex. 1132), and Schutzer (Ex 1130).
- IV. Whether substitute claims 37-47 are unpatentable as drawn to ineligible subject matter under 35 U.S.C. § 101.
- V. Whether substitute claims 39, 44, and 47 satisfy 35 U.S.C § 112.
- VI. Whether Patent Owner has complied with its duty of candor under 37 C.F.R. § 42.11.
- VII. Whether Patent Owner is estopped from reintroducing the financial subject matter from disclaimed claims 5-8, 17-20, and 26-30 into its substitute claims.
- VIII. Respond to any arguments raised in Patent Owner's Reply (Paper No. 34) to Petitioner's Conditional Motion to Amend Opposition.
- IX. Respond to Patent Owner's Motion to Exclude, if one is submitted.
- X. Respond to any issues specified by Patent Owner in its request for oral argument.

- XI. Respond to Patent Owner's presentation on all matters.
- XII. Any arguments raised by the Parties in their respective papers, motions, oppositions, responses, replies, and sur-replies.
- XIII. Issues related to the Board's Decision on Institution and the grounds instituted in the Decision.
- XIV. Any issues raised in the briefing pursuant to the schedule.
- XV. Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Respectfully Submitted,

Date: July 19, 2019

/Monica Grewal/

Monica Grewal
Registration No. 40,056

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2019, I caused a true and correct copy of
Petitioner Apple Inc.'s Request for Oral Argument to be served via electronic
mail on the following correspondents of record as listed in Patent Owners'

Mandatory Notices:

James M. Glass (jimglass@quinnemanuel.com)
Tigran Guledjian (tigranguledjian@quinnemanuel.com)
Christopher A. Mathews (chrismathews@quinnemanuel.com)
Nima Hefazi (nimahefazi@quinnemanuel.com)
Richard Lowry (richardlowry@quinnemanuel.com)
Razmig Messerian (razmesserian@quinnemanuel.com)
Jordan B. Kaericher (jordankaericher@quinnemanuel.com)
Harold A. Barza (halbarza@quinnemanuel.com)
Quinn Emanuel USR IPR (qe-usr-ipr@quinnemanuel.com)
QUINN, EMANUEL, URQUHART & SULLIVAN, LLP

Respectfully Submitted,

Date: July 19, 2019

/Monica Grewal/
Monica Grewal
Registration No. 40,056