

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
VISA INC., and VISA U.S.A. INC.,
Petitioners,

v.

UNIVERSAL SECURE REGISTRY LLC,
Patent Owner.

Case IPR2018-00813¹
U.S. Patent 9,100,826

PATENT OWNER'S REQUEST FOR ORAL HEARING

¹ Visa Inc. and Visa U.S.A. Inc., which filed a petition in IPR2019-00176, have been joined as a party to this proceeding.

Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order (Paper No. 10), Patent Owner Universal Secure Registry LLC (“Patent Owner”) hereby respectfully requests that the Board grant oral argument, currently scheduled for July 16, 2019. *Id.* at 8.

I. TIME REQUESTED AND ISSUES TO BE ARGUED

Given the overlap of issues between IPR2018-00809, IPR2018-00810, and IPR2018-00813 (“the Proceedings”), Patent Owner requests that the Board authorize the parties to present their arguments for the Proceedings in a single hearing, and that each side be allotted forty-five (45) minutes total for oral argument for all three consolidated Proceedings.²

The principal issues to be argued for IPR2018-00813 include:

1. Any issues properly raised by Petitioner, including in the Petition and Reply, such as whether any of the challenged claims of U.S. Patent No. 9,100,826 are patentable under 35 U.S.C. §§ 102, 103;

² Patent Owner communicated this proposal to Petitioner on June 5, 2019, and Petitioner responded two days later that it desired 60 minutes per side per proceeding instead. Believing a six-hour long hearing across the Proceedings would pose an undue burden on the Board and the parties, on June 7, 2019 Patent Owner attempted to compromise by proposing that the parties each have 60 minutes per side for all three Proceedings. This proposal went unanswered by Petitioner.

2. Any issues raised by Patent Owner, including in Patent Owner's Response and Sur-reply;
3. Any issues concerning the patentability of the proposed substitute claims in Patent Owner's Conditional Motion to Amend;
4. Any procedural or evidentiary issues raised, *e.g.*, Motion to Strike and related briefing;
5. Any additional issues raised in any motion or paper filed before oral argument, or any other additional issues on which the Board seeks clarification.

Patent Owner respectfully reserves the right to supplement and/or amend the foregoing statement of issues to the extent permitted by the Rules and the Board.

II. LOGISTICS

Subject to the Board's approval, Patent Owner intends to use demonstrative exhibits during the oral argument. Such demonstrative exhibits will be served in due course according to 37 C.F.R. § 42.70(b). Patent Owner also intends to request the use of audio-visual equipment during its presentation, including a computer, projector, and screen on which to display demonstrative exhibits.

DATED: June 10, 2019

Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ James M. Glass

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the PATENT OWNER'S REQUEST FOR ORAL HEARING was served on June 10, 2019 by e-mailing copies to:

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