

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

BRADIUM TECHNOLOGIES LLC
Patent Owner

IPR2018-00952

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Petitioner respectfully requests oral argument which has been tentatively scheduled for September 17, 2019. Paper 32, Scheduling Order, at 7. Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- whether Petitioner has met its burden in demonstrating that the challenged claims are unpatentable in view of issues in the Petition and Petitioner's Reply as well as supporting evidence;
- issues related to the Board's Decision on Institution and the ground instituted in the Decision;
- whether claim 20 is unpatentable for obviousness under 35 U.S.C. § 103;
- whether Petitioner is the sole real party-in-interest;
- reply to any arguments raised in the Patent Owner's Response and Sur-Reply;
- whether Patent Owner's Motion to Amend should be denied in view of issues raised in Petitioner's Opposition and Sur-Reply as well as supporting evidence;
- reply to any arguments raised in the Motion to Amend and Reply to Opposition;

- response to any issues specified by Patent Owner in its request for oral argument; and
- any issues raised in briefing pursuant to the schedule.

Petitioner requests that each party have 30 minutes of time for argument for a total of 60 minutes for the session. To the extent the Board schedules this hearing to last more than the total hearing time requested by Petitioner, Petitioner request that it be given half the total length.

Petitioner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits. Petitioners also request that two attorneys at Petitioner's counsel's table be allowed to use computers at the hearing (in addition to the counsel making the argument using his or her computer to show the demonstratives), to avoid the need for the parties to bring entire paper copies of the record into the hearing room and to facilitate efficient answering of panel questions.

No fee is believed due with this request; however, the Director is hereby authorized to charge any shortfall or credit any overpayment to Deposit Account 50-6990.

Petitioner's Request for Oral Argument, IPR2018-00952
U.S. Patent 9,253,239

Date: August 20, 2019

Respectfully,

/s/ Roshan S. Mansinghani

Roshan S. Mansinghani

Registration No. 62,429

CERTIFICATE OF SERVICE

I certify that on August 20, 2019, I served a copy of Petitioner's Request for Oral Argument via email, as agreed by the parties, on the following counsel for Patent Owner:

Chris J. Coulson
Michael N. Zachary
Bunsow De Mory LLP
701 El Camino Real Redwood City, CA 94063
Email: ccoulson@bdiplaw.com
Email: mzachary@bdiplaw.com

Michael E. Shanahan
Email: mshanahan@generalpatent.com

Respectfully,

Date: August 20, 2019

/s/ Roshan S. Mansinghani

Roshan S. Mansinghani
Registration No. 62,429