

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD. and  
GOOGLE LLC  
Petitioner,

v.

IRON OAK TECHNOLOGIES, LLC,  
Patent Owner.

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IPR2018-01552<sup>1</sup>  
U.S. Patent No. 5,699,275

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**PATENT OWNER REQUEST FOR ORAL ARGUMENT**  
**PURSUANT TO 37 C.F.R. §42.70(a)**

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<sup>1</sup> Google LLC, who filed a petition in IPR 2019-00110, has joined as a petitioner in this proceeding.

Patent Owner Iron Oak Technologies, LLC, hereby requests an oral argument pursuant to 37 C.F.R. § 42.70. The Board has previously scheduled oral argument in this case for November 4, 2019

Patent Owner specifies the following issues to be argued:

1. Whether Petitioner has met its burden of proving that claim 1 is anticipated by Sugita, or obvious over Sugita in combination with Wortham, including, in particular, whether Petitioner has shown that that Sugita alone or in combination discloses or renders obvious the requirement of claim 1 that the Manager Host is operable to decide *not* to send to a Second Mobile Unit the at least one discrete patch message that was sent to the First Mobile Unit even though the Second Mobile Unit is operable to create Patched Operating Code from the at least one discrete patch message?

2. Whether Petitioner has met its burden of proving that claim 1 is obvious over Ballard in combination with Shimizu, including, in particular, whether Petitioner has shown that that the combination discloses or renders obvious the requirement of claim 1 that the Manager Host is operable to decide *not* to send to a Second Mobile Unit the at least one discrete patch message that was sent to the First Mobile Unit even though the Second Mobile Unit is operable to create Patched Operating Code from the at least one discrete patch message?

Patent Owner requests the ability use video equipment (including use of a computer, projector, and screen) to display exhibits, including potentially demonstrative exhibits, during oral argument.

Dated September 30, 2019

Respectfully submitted,

By: /Al Deaver/

Albert B. Deaver, Jr.  
Reg. No. 34,318  
Lead Counsel for Patent Owner

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), I certify that an electronic copy of the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was served along with any accompanying exhibits via the Patent Review Processing System and via email to Petitioner's counsel.

Date: September 30, 2019

Respectfully submitted,

By: /Al Deaver/

Albert B. Deaver, Jr.  
Reg. No. 34,318  
Lead Counsel for Patent Owner