

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANON INC. and CANON U.S.A., INC., and
AXIS COMMUNICATIONS AB,

Petitioners,

v.

AVIGILON FORTRESS CORPORATION,
Patent Owner.

Case: IPR2019-00311
U.S. Patent No. 7,932,923

PARTIES' JOINT REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper No. 9), Patent Owner and Petitioners hereby request oral argument. Pursuant to the Scheduling Order, oral argument is scheduled to occur on April 8, 2020. The Parties intend to discuss the issues raised in the filings, including, but not limited to, the following items:

1. The patentability/unpatentability of all challenged claims based on the instituted grounds, including the appropriate claim construction of the material disputed terms;
2. Rebuttal to the respective opposing side's presentation on all matters; and;
3. Any other issues that the Board deems necessary for issuing a final written decision.

The Parties jointly request that each side be given a total of 75 minutes to present its arguments with respect to the issues identified in this request for oral argument, as well as the issues identified in the requests for oral argument Petitioners are concurrently submitting in the related proceeding IPR2019-00314.

The Parties jointly request that they be permitted to reserve time to present rebuttal arguments, if necessary.

The Parties also jointly request the ability to use computers and audio/visual equipment to display demonstrative exhibits and evidence, including the use of a projector and screen.

Dated: February 24, 2020

By: /C. Gregory Gramenopoulos/

C. Gregory Gramenopoulos
Reg. No. 36,532

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER LLP

901 New York Avenue, NW
Washington, DC 20001-4413
Tel. 202.408.4263; Fax 202.408.4400

gramenoc@finnegan.com

*Attorney for Petitioner
Axis Communications AB*

By: /Reza Dokhanchy/

Reza Dokhanchy
Reg. No. 62,795

KIRKLAND & ELLIS LLP

555 California Street
San Francisco, CA 94104
Tel. 415.439.1400; Fax 415.439.1500

reza.dokhanchy@kirkland.com

*Attorney for Patent Owner
Avigilon Fortress Corporation*

By: /Joseph A. Calvaruso/

Joseph A. Calvaruso
Reg. No. 28,287

ORRICK, HERRINGTON & SUTCLIFFE
LLP

51 West 52nd Street
New York, NY 10019-6142
Tel. 212.506.5140; Fax 212.506.5151

JVCPTABDocket@orrick.com

*Attorney for Petitioners
Canon Inc. and Canon U.S.A., Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Parties' Joint Request For Oral Argument was served on February 24, 2020, via email directed to counsel of record for Avigilon at the following addresses:

Reza Dokhanchy
Adam R. Alper
Akshay S. Deoras
Kirkland & Ellis LLP
555 California Street
San Francisco, CA 94104
reza.dokhanchy@kirkland.com
adam.alper@kirkland.com
akshay.deoras@kirkland.com
Avigilon_Axis@kirkland.com

Michael W. De Vries
Kirkland & Ellis LLP
555 Flower Street
Los Angeles, CA 90071
michael.devries@kirkland.com

Dated: February 24, 2020

By: /Joseph A. Calvaruso/

ORRICK, HERRINGTON & SUTCLIFFE LLP