

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

APPLE, INC.  
Petitioner

v.

UUSI, LLC d/b/a NARTRON,  
Patent Owner

---

Case IPR2019-00359  
Patent No. 5,796,183

---

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner UUSI, LLC d/b/a NARTRON, hereby requests an oral argument on the issues set forth below at a time and in a manner set by the Board.

Oral argument is presently scheduled for May 7, 2020 at the San Jose, California, USPTO Regional Office. In view of the USPTO Notices<sup>1</sup> regarding COVID-19, Patent Owner respectfully requests that oral argument in this IPR proceeding be conducted remotely by video in the event that in-person oral argument is prohibited.

Patent Owner respectfully requests one (1) hour of total argument time, per side, in which to present arguments on the issues listed below.

### **ISSUES TO BE ARGUED**

- I. Whether claims 27, 83-85, and 90 are unpatentable as obvious over Chiu alone or Chiu combined with Schwarzbach under 35 U.S.C. § 103;
- II. Whether claims 86-88 are unpatentable as obvious over Chiu, Schwarzbach, and Meadows under 35 U.S.C. § 103;
- III. Whether claim 91 is unpatentable as obvious over Chiu, Schwarzbach, and Ingraham '548 under 35 U.S.C. § 103;

---

<sup>1</sup> See <https://www.uspto.gov/coronavirus> (currently prohibiting in-person oral hearings and closing USPTO offices to the public).

- IV. Whether claims 28 and 92 are unpatentable as obvious over Chiu, Schwarzbach, and Tucker under 35 U.S.C. § 103;
- V. Whether claims 32, 36, and 93 are unpatentable as obvious over Chiu and Lawson or Chiu, Schwarzbach, and Lawson under 35 U.S.C. § 103;
- VI. Patent Owner's responses to and addressing of: Petitioner's new claim interpretations, new arguments, and new rationales, set forth in Petitioners' Reply dated February 4, 2020;
- VII. All instituted grounds for which the PTAB's Institution Decision found that Petitioner established a reasonable likelihood that it would prevail in establishing unpatentability;
- VIII. All instituted grounds for which the PTAB's Institution Decision found that Petitioner did not establish a reasonable likelihood that it would prevail in establishing unpatentability that Petitioner continues to challenge;
- IX. All arguments and issues raised in Patent Owner's Preliminary Response, Patent Owner's Response, and Patent Owner's Sur-Reply; and
- X. All arguments and issues raised by Petitioner in the Petition, Reply, and during oral argument.

Patent Owner also respectfully requests the ability to use audiovisual equipment to display possible demonstrative exhibits, including the use of a projector and screen should oral argument take place in person, and permission to share a presentation via remote connection should oral argument take place remotely via video.

Respectfully submitted,

Dated: March 24, 2020

By: / Lawrence M. Hadley /

Lawrence M. Hadley (*pro hac vice*)  
Stephen Underwood (Reg. # 77,977)

GLASER WEIL FINK HOWARD  
AVCHEN & SHAPIRO LLP  
10250 Constellation Blvd., 19th Floor  
Los Angeles, California 90067  
Telephone: (310) 553-3000  
[lhadley@glaserweil.com](mailto:lhadley@glaserweil.com)  
[sunderwood@glaserweil.com](mailto:sunderwood@glaserweil.com)

Joseph A. Rhoa (Reg. # 37,515)  
Jonathan A. Roberts (Reg. # 68,565)

NIXON & VANDERHYE P.C.  
901 North Glebe Road, 11th Floor  
Arlington, VA 22203-1808  
Tel.: 703-816-4043  
Tel.: 703-816-4414  
Email: [jar@nixonvan.com](mailto:jar@nixonvan.com)  
Email: [jr@nixonvan.com](mailto:jr@nixonvan.com)

Counsel for Patent Owner

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on the date indicated below, a complete and entire copy of the foregoing Patent Owner's Request for Oral Argument was provided by email to Petitioner's counsel via email, as agreed to by Petitioner's Service Information in the Petition submission, by serving the email address of record as follows:

W. Karl Renner, Reg. No. 41,265  
Jeremy Monaldo, Reg. No. 58,680  
Daniel D. Smith, Reg. No. 71,278  
Fish & Richardson P.C.  
3200 RBC Plaza  
60 South Sixth Street  
Minneapolis, MN 55402  
Tel: 202-783-5070  
Fax: 877-769-7945  
IPR39521-0062IP5@fr.com  
PTABInbound@fr.com  
axf-ptab@fr.com  
monaldo@fr.com  
dsmith@fr.com

Date: March 24, 2020

By: /Jonathan A. Roberts/  
Jonathan A. Roberts  
Reg. No. 68,565  
NIXON & VANDERHYE, PC  
901 N. Glebe Rd., Suite 1100  
Arlington, Virginia 22203  
Telephone: (703) 816-4414  
Email: jr@nixonvan.com