## UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

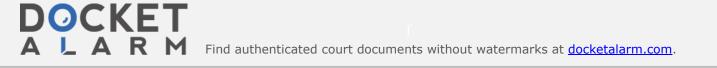
APPLE, INC. Petitioner

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>&</sup>lt;sup>1</sup> *See* <u>https://www.uspto.gov/coronavirus</u> (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 ( <i>pro hac vice</i> ) Stephen Underwood (Reg. # 77,977)
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		Counsel for Patent Owner

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## **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 dsmith@fr.com

Date: March 24, 2020

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