

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

MPH TECHNOLOGIES OY,
Patent Owner.

Case IPR2019-00820
Patent 7,937,581

**PATENT OWNER MPH TECHNOLOGIES OY'S
REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70 and the Board's September 27, 2019 Scheduling Order (Paper 11), MPH Technologies Oy ("Patent Owner") respectfully requests oral argument, as currently scheduled for June 25, 2020.

Reservation Of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund, Ltd. et al. v. VirnetX, Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.").

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, anticipation, obviousness, motivation to combine, and reasonable expectation of success;
- The timeliness of the arguments raised in the proceedings;
- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and

- Any other issues that the Board deems necessary for issuing a Final Written Decision, including any questions, rebuttals, or arguments that may arise during the oral argument.

The Board's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 45 minutes of total argument time per side. Patent Owner believes that this is a sufficient amount of time to discuss all issues in dispute in this case.

Equipment: Patent Owner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits.

Respectfully submitted,

/James T. Carmichael/
James T. Carmichael, Reg. No. 45,306
CARMICHAEL IP, PLLC

Date: May 13, 2020

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, on the date signed below:

**PATENT OWNER MPH TECHNOLOGIES OY'S
REQUEST FOR ORAL ARGUMENT**

The names and address of the parties being served are as follows:

Michael D. Specht	mspecht-PTAB@sternekessler.com
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Respectfully submitted,

/Jason Linger/

Date: May 13, 2020