

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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ADVANCED MICRO DEVICES, INC.

Petitioner

v.

AQUILA INNOVATIONS INC.

Patent Owner

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Case IPR2019-01525

Patent 6,239,614 B2

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

Pursuant to 37 C.F.R § 42.70 and the Board's Scheduling Order, Patent Owner Aquila Innovations Inc. respectfully requests oral argument, currently scheduled for December 11, 2020.

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

- Issues raised in the petition, including, for example, claim construction, motivation to combine, and reasonable expectation of success:
  - Claims 1 - 3 are not obvious over Urano and Mutoh021;
  - Claims 1 - 3 are not obvious over Mutoh and Mutoh021;
  - Claims 4 and 5 are not obvious over Douseki and Ramus;
- The timeliness of the arguments raised in the proceedings;
- The constitutionality of this proceeding;
- 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.

**Location:** Patent Owner respectfully requests that oral argument be conducted remotely.

**Time of day:** Because Patent Owner's counsel is located in the Pacific Time Zone, it is respectfully requested that, if possible, oral argument be held in the afternoon.

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

Date: October 30, 2020

*/Jing H. Cherng/*

Jing H. Cherng

Reg. No. 68,144

Counsel for Patent Owner

## CERTIFICATE OF SERVICE

It is certified that a copy of the foregoing has been served on Petitioner via electronic mail transmission addressed to the person(s) at the address below:

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