

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELL, INC.,

Petitioner

v.

3G LICENSING S.A.,

Patent Owner

Case IPR2020-01162

Patent No. 8,948,756

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Patent Owner, 3G Licensing S.A. (“3G”) hereby requests oral argument under 37 C.F.R. § 42.70 and the Board’s February 17, 2021 Scheduling Order (Paper 12). Oral argument is currently scheduled for December 15, 2021. (Revised Scheduling Order, Paper 36 at 7.)

Patent Owner requests argument on all grounds accepted for trial in the Institution Decision, including:

1. Whether claims 1-3, 5-7, 9, and 10 are unpatentable under 35 U.S.C. § 103 over Chen;
2. Whether claims 1-10 are unpatentable under 35 U.S.C. § 103 over Chen in Combination with Eriksson;
3. Whether claims 1-10 are unpatentable under 35 U.S.C. § 103 over Chen in Combination with GSM 03.64
4. Patent Owner’s Revised Motion to Amend

Furthermore, Patent Owner requests argument on any additional issues that Petitioners may seek to raise on oral argument, including rebuttal to any material in Petitioners’ presentation, any additional issues raised in papers which are yet to be filed such as Motions to Exclude, and any other filings, motions, pleadings, or issues deemed necessary by the Board for issuing a Final Written Decision.

Given the number of combinations of prior art and number of challenged claims, Patent Owner suggests that an allocation of one hour per side would be

appropriate for the oral argument in a combined hearing with IPR2020-01157, IPR2020-01158, IPR2020-01159, IPR2020-01160, and IPR2020-01161.

In accordance with the USPTO's online notice of March 13, 2020 (<https://www.uspto.gov/patents-application-process/patent-trial-and-appealboard/hearings>), Patent Owner understands that until further notice hearings will be conducted remotely by video or telephone. Accordingly, Patent Owner requests the ability to participate remotely in this manner and to use screen sharing software to display demonstratives and record documents/exhibits. In the event the hearing is to be held in-person, Patent Owner requests the ability to use audio-visual equipment at the hearing, including an Elmo, laptop, projector and screen to display demonstratives and exhibits.

Finally, Patent Owner hereby notifies the Board, pursuant to the Scheduling Order (Paper 12 at 6-7), that it anticipates that more than five (5) individuals will attend the argument on its behalf.

Dated: November 3, 2021

Respectfully submitted,

/ Timothy Devlin /

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Attorney for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on November 3, 2021 the foregoing document was served via electronic mail upon the following counsel of record for Petitioner:

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