

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,

Petitioner

v.

LBT IP I LLC,

Patent Owner

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Case No. IPR2020-01189

U.S. Patent No. 8,497,774

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to the Board's March 4, 2021, Scheduling Order (Paper 10), Petitioner respectfully requests oral argument for the trial currently scheduled on December 9, 2021. Petitioner requests oral argument for this IPR (IPR2020-01189) be combined with oral argument for IPR2020-01191 and IPR2020-01192 (for which a Request for Oral Argument is concurrently filed). Although the patents of the three IPRs are related, the grounds and arguments are varied amongst the three patents, and each IPR includes a Contingent Motion to Amend. The Parties conferred and jointly request a total argument time of 120 minutes for each Party. Petitioner also requests a single set of demonstratives be used for all IPRs. If the Board is allowing in-person hearings, Petitioner further requests the hearing take place in Alexandria, Virginia.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

1. Whether Claims 1, 4, 5, 6, 8, 10, 13, and 15 are obvious under § 103 over Japanese Patent Application No. JP2004-37116A to Sakamoto ("*Sakamoto*");
2. Whether Claims 1, 4, 5, 6, 8, 10, 13, and 15 are obvious under § 103 over *Sakamoto* in view of Applicant Admitted Prior Art;
3. Whether Claims 1, 4, 5, 6, 8, 10, 13, and 15 are obvious under § 103 over *Sakamoto* in view of U.S. Patent No. 5,845,142 to Hayasaka ("*Hayasaka*");

4. Any claim constructions, unpatentability grounds, or other issues raised in the Petition or Petitioner Reply, the Patent Owner Preliminary Response, Patent Owner Response, the Patent Owner Sur-Reply, or the Board's Institution Decision;
5. Any claim constructions, unpatentability grounds, or other issues raised in the Patent Owner Motion to Amend and follow-up briefing by the Parties, including the Petitioner Objection to Motion to Amend and Patent Owner Reply;
6. Any issues regarding motions to exclude or motions to strike that may be filed or pending; and
7. Any issues otherwise raised by the Board.

Respectfully submitted,

ERISE IP, P.A.

BY: /s/Jennifer C. Bailey

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ATTORNEYS FOR PETITIONER  
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**CERTIFICATE OF SERVICE ON PATENT OWNER  
UNDER 37 C.F.R. § 42.6**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 25, 2021, the foregoing *Petitioner's Request for Oral Argument* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

Mitchell S. Zajac (zajac@butzel.com)

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*/s/ Jennifer C. Bailey* \_\_\_\_\_

Jennifer C. Bailey, Reg. No. 52,583