| UNITED STATES PATENT AND TRADEMARK OFFICE  BEFORE THE PATENT TRIAL AND APPEAL BOARI |                        |
|---|------------------------|
|   |                        |
|   | Intel Corporation      |
|   | Petitioner,            |
|   | V.                     |
|   | ParkerVision, Inc.     |
|   | Patent Owner.          |
|   | Case No. IPR2020-01265 |
|   | Patent No. 7,110,444   |

## PETITIONER'S REQUEST FOR ORAL ARGUMENT



Pursuant to the Board's January 28, 2021 Scheduling Order (Paper No. 11),

Petitioner respectfully requests oral argument, as currently scheduled on November 1, 2021. Petitioner respectfully requests that the oral argument take place remotely pursuant to the USPTO update on in-person meetings of March 13, 2020 (<a href="https://www.uspto.gov/about-us/news-updates/uspto-update-person-meetings">https://www.uspto.gov/about-us/news-updates/uspto-update-person-meetings</a>). Petitioner respectfully requests the ability to present possible demonstratives and exhibits.

The parties met and conferred but did not agree on the amount of argument time to request. Because Petitioner does not believe this proceeding presents any special circumstances warranting more time than ordinarily required, Petitioner requests sixty (60) minutes of argument time for each side, consistent with the Board's ordinary practice. *See* PTAB Trial Practice Guide (November 2019) at 81-82 ("[t]he Board expects to ordinarily provide for an hour of argument per side for a single proceeding"). Patent Owner requests seventy-five (75) minutes of argument time for each side.

Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

• Issues related to the Board's Decision on Institution and the grounds instituted in the Decision.



- Interpretation of the claim terms "frequency down-conversion module," "subtraction module," "storage element," and "switch."
- Interpretation of an "energy transfer system" under Patent Owner's proposed construction of "storage element"
- The patentability of challenged claims 1, 3, and 5 under 35 U.S.C. §
   103 over Tayloe in view of TI Datasheet.
- The patentability of challenged claims 1, 3, and 5 under 35 U.S.C. §
   103 over Tayloe in view of Kawada.
- The secondary considerations of non-obviousness alleged in Patent Owner's Response.
- Patent Owner's intent to disclaim claims 1 and 5.
- Petitioner's arguments raised in the Petition and Petitioner's Reply.
- Petitioner's response to any arguments raised in Patent Owner's Response and Patent Owner's Sur-Reply.
- Petitioner's response to any issues specified by Patent Owner in its request for oral argument.
- Petitioner's response to any issues raised in briefing pursuant to the schedule.



## IPR2020-01265

Petitioner's Request for Oral Argument

Respectfully Submitted,

Date: September 23, 2021 /Brian J. Lambson/

Brian J. Lambson

Registration No. 72,570 Counsel for Petitioner



## Petitioner's Request for Oral Argument

## **CERTIFICATE OF SERVICE**

I hereby certify that, on September 23, 2021, I caused a true and correct copy of the foregoing materials:

• Petitioner's Request for Oral Argument

to be served via email, as consented to by Patent Owner, to:

Jason S. Charkow (jcharkow@daignaultiyer.com)

Chandran B. Iyer (<a href="mailto:cbiyer@daignaultiyer.com">cbiyer@daignaultiyer.com</a>)

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Respectfully Submitted,

/Brian J. Lambson/ Brian J. Lambson Registration No. 72,570

