

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED and
ZYXEL COMMUNICATIONS CORPORATION¹,

Petitioners,

v.

UNM RAINFOREST INNOVATIONS,

Patent Owner.

PTAB Case No. IPR2021-00375
Patent 8,265,096 B2

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)**

¹ ZyXEL Communications Corporation was joined as a petitioner in this proceeding based on a petition and motion for joinder filed in IPR2021-00734, which were granted.

Patent Owner UNM Rainforest Innovations respectfully requests oral argument, which is currently scheduled for May 12, 2022. Patent Owner requests a total of 30 minutes to present its arguments, as well as to reserve a portion of its total time for presenting rebuttal arguments after Petitioner's presentation.

Pursuant to 37 C.F.R § 42.70, and without intending to waive any issue not specifically identified, Patent Owner specifies the following issues to be argued regarding the present IPR:

1. The patentability of challenged claims 1–4 and 6–8 of the '096 Patent with respect to each ground set forth in the Petition;
2. The patentability of the contingent proposed amended claims subject of Patent Owner's Revised Motion to Amend;
3. The admissibility of the declaration testimony of Petitioner's expert Dr. Roy;
4. Any issues subsidiary to the above issues, including, but not limited to, publication status, claim construction, priority date, assessment of evidence, and admissibility and sufficiency of evidence;
5. Any other issues raised in papers filed in the present proceeding, including issues raised in any papers filed between today and the oral hearing; and
6. Any other issue raised addressed by Petitioner.

Patent Owner requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector to be connected to a laptop and a screen for displaying documents.

Dated: April 12, 2022

Respectfully submitted,

/s/ Jay P. Kesan

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UNM RAINFOREST INNOVATIONS

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e)(4) and 42.25(b), the undersigned certifies that on April 12, 2022, a complete copy of the foregoing document was filed electronically through the Patent Trial and Appeal Board's PTAB E2E System and provided, via electronic service, to the Petitioner by serving the correspondence address of record.

Dated: April 12, 2022

/s/ Jay P. Kesan
Jay P. Kesan