

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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QUALCOMM INCORPORATED,

Petitioner,

v.

UNM RAINFOREST INNOVATIONS,

Patent Owner.

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Case IPR2021-00375

Patent No. 8,265,096 B2

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

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Second Revised Scheduling Order dated December 10, 2021 (Paper 29), Petitioner requests oral argument on the issues set forth below at a time and place set by the Board. Oral argument is currently scheduled for May 12, 2022.

Oral argument in IPR2021-00377 and IPR2021-00582 also is scheduled for May 12, 2022. Given the overlap in issues between this proceeding and those two, particularly with respect to Petitioner's oppositions to Patent Owner's motions to amend, Petitioner requests that the Board hold a consolidated oral argument. If the Board holds a consolidated oral argument, Petitioner respectfully requests that it and Patent Owner each be allotted two hours of argument time for a total of four hours for the consolidated session for all three IPRs. If the Board does not hold a consolidated argument, Petitioner respectfully requests that it and Patent Owner each be allotted 45 minutes of argument time for a total of one and a half hours for the session for the instant IPR only. To the extent that the Board schedules this hearing to last more or less than the total hearing time requested by Petitioner, Petitioner requests that it be given half of the total hearing time.

Petitioner respectfully requests oral argument on all issues raised in the parties' filings, including but not limited to the following:

1. Whether claims 1–4 and 6–8 of U.S. Patent No. 8,265,096 are unpatentable based on the grounds on which the Board instituted trial.

2. Whether UNM's Motion to Amend should be denied.
3. Whether UNM's "Objection To The Expert Report Of Dr. Roy," which UNM filed as a motion to exclude (Paper 39), should be denied.
4. Rebuttal to issues raised by Patent Owner in this proceeding.
5. Any issues specified by Patent Owner in a request for oral argument.
6. Rebuttal to Patent Owner's presentation on all matters.
7. Any other issues briefed or presented by the parties throughout this trial.
8. Any other issues that may affect the Board's determinations in this proceeding.

Petitioner understands that the Board has been conducting certain hearings by videoconference. Petitioner agrees to a videoconference for the hearing. If the Board decides to hold an in-person hearing, Petitioner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits. Petitioner also asks that three spaces be reserved for counsel at counsel's table, and that three additional spaces be reserved in the hearing room to accommodate additional counsel and corporate representatives. Petitioner also requests that three attorneys at Petitioner's counsel's table be allowed to use computers.

Dated: April 12, 2022

Respectfully submitted,

/s/ Jonathan I. Detrixhe

Lead Counsel

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*Counsel for Petitioner*

## 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 Petitioner's Request for Oral Argument was filed electronically through the Patent Trial and Appeal Board's PTABE2E System and provided, via electronic service, to the Patent Owner by serving the correspondence address of record.

Dated: April 12, 2022

Respectfully submitted,

/ Jonathan I. Detrixhe /

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