

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.

GUI GLOBAL PRODUCTS, LTD.,

Patent Owner.

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Case IPR2021-00473

U.S. Patent No. 10,589,320

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a) and the Board’s August 13, 2021, Scheduling Order (Paper 10), Patent Owner, GUI Global Products, Ltd. (“Patent Owner”), requests the opportunity to present oral argument in this matter. The oral argument is scheduled to be held on May 19, 2022. Paper 10 at 11.

Related IPR2021-00470 re U.S. Patent 10,259,020, IPR2021-00471 re U.S. Patent 10,259,021, and IPR2021-00472 re U.S. Patent 10,562,077 are currently pending between the same parties as are involved in this proceeding and Patent Owner is concurrently requesting oral argument in these related proceedings, which also have a hearing date scheduled for May 19, 2022. The issues presented for review in IPRs 2021-00470, 2021-00471, and 2021-00472 are substantially similar as those presented for review in this proceeding. Therefore, Patent Owner requests that a single, consolidated hearing for all of these proceedings be conducted for convenience of the parties and the Board. Patent Owner requests a total of 90 minutes per side argument time for the single, consolidated hearing. Alternatively, if the Board does not desire a single, consolidated hearing, then Patent Owner requests a total of 60 minutes per side for the hearing on this IPR 2021-00473.

Issues to be addressed during oral argument:

1. Whether Petitioner has met its burden of proving that Gundlach and Lee render claims 1, 2, 8, 9, and 11 obvious.
2. Whether Petitioner has met its burden of proving that Gundlach,

Lee, and Nishikawa render claims 2 and 8 obvious.

3. Whether Petitioner has met its burden of proving that Gundlach, Lee, and Rosener render claim 11 obvious.
4. Whether Petitioner has met its burden of proving that Gundlach, Lee, and Brown render claims 3 and 7 obvious.
5. Whether Petitioner has met its burden of proving that Gundlach, Lee, and Mak-Fan render claims 4, 5, 10, 12, and 13 obvious.
6. Whether Petitioner has met its burden of proving that Gundlach, Lee, and Kim render claims 1, 2, 8, 9, and 11 obvious.
7. Whether Petitioner has met its burden of proving that Gundlach, Lee, Kim, and Nishikawa render claims 2 and 8 obvious.
8. Whether Petitioner has met its burden of proving that Gundlach, Lee, Kim, and Rosener render claim 11 obvious.
9. Whether Petitioner has met its burden of proving that Gundlach, Lee, Kim, and Brown render claims 3 and 7 obvious
10. Whether Petitioner has met its burden of proving that Gundlach, Lee, Kim, and Mak-Fan render claims 4, 5, 10, 12, and 13 obvious
11. Any other issues raised in Petitioner's Petition.
12. Any issues raised in Patent Owner's Response.
13. Whether any matters asserted in Petitioner's Reply that were not

asserted in Petitioner's Petition should be considered by the Board.

Subject to the foregoing, any issues raised in Patent Owner's Sur-Reply.

14. Patent Owner's and Petitioner's Motions to Exclude Evidence, if any;
15. Rebuttal of any arguments made by Petitioner;
16. Any additional issues on which the Board seeks clarification; and
17. Response to any issues Petitioner raises in its Request for Oral Argument.

Patent Owner respectfully reserves the right to supplement and/or amend the foregoing statement of issues to the extent the Rules permit.

Petitioner is the party with the burden of proof and will present first at the oral hearing. Patent Owner will address any issues raised by Petitioner, or questions raised by the Board during presentation.

Patent Owner understands it is likely that oral argument may be conducted remotely by video or telephone in view of the ongoing COVID-19 coronavirus pandemic. In the event that oral argument is conducted in-person, Patent Owner requests the use of audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen.

Date: April 4, 2022

Respectfully submitted,

/John J. Edmonds /

John J. Edmonds, Reg. No. 56,184  
ad Counsel for Patent Owner

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

#### PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

was served on April 4, 2022, by filing this document though the PTAB E2E System as well as by delivering a copy via email directed to the attorneys of record for the Petitioner at the following addresses:

patrick@fr.com; rizzolo@fr.com; pacheco@fr.com; Leung@fr.com;  
kdarby@fr.com; devoto@fr.com; renner@fr.com

The parties have agreed to electronic service in this proceeding.

Date: April 4, 2022

Respectfully submitted,

/John J. Edmonds /

John J. Edmonds, Reg. No. 56,184  
Lead Counsel for Patent Owner