

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

APPLE INC.,
Petitioner

v.

BILLJCO LLC,
Patent Owner

CASE: IPR2022-00131
U.S. PATENT NO. 8,639,267

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's May 23, 2022 Scheduling Order (Paper 8), Patent Owner BillJCo, LLC respectfully requests oral argument on all outstanding issues, specifically including, but not limited to the following issues. Oral argument is presently scheduled for February 22, 2023 (Paper No. 8, "Scheduling Order").

Without waiving any issue not specifically identified herein, Patent Owner specifies at least the following issues to be presented by Patent Owner at oral argument:

1. Proper construction of the relevant claims of the 8,639,267 Patent;
2. Arguments and evidence that the Challenged Claims of the 8,639,267 Patent are not obvious in view of Haberman.
3. Arguments and evidence that the Challenged Claims of the 8,639,267 Patent are not obvious in view of Haberman in view of Boger.
4. Arguments and evidence that the Challenged Claims of the 8,639,267 Patent are not obvious in view of Vanluijt.
5. Rebuttal to Petitioner's arguments and evidence on all matters including the issues listed above.

6. Arguments on all issues specified by Petitioner and/or the Board for argument;

7. Any other issues raised in motions or papers filed and/or to be filed in this proceeding, including any Motions to Strike/Exclude and/or Oppositions to Motions to Strike/Exclude; and/or objections to demonstrative exhibits, and/or any other motion or paper filed by any party before oral argument; and

8. Any other outstanding motions and pleadings, and other issues upon which the Board seeks clarification and/or that the Board deems necessary for issuing a Final Written Decision.

Patent Owner requests 45 minutes for argument time for a total of 1 hour and 30 minutes for the session. To the extent the Board schedules this hearing to last more or less than the total hearing time requested by Patent Owner, Patent Owner requests to be give half the total length.

If this oral argument cannot be held in-person, Patent Owner requests the hearing take place via video conference. Patent Owner requests the ability to present demonstratives and exhibits to the Board and have the ability to have Patent Owner's counsel attend the video conference from separate locations.

If this oral argument can be held in-person, Patent Owner requests the ability to use audio-visual equipment to display demonstratives and exhibits. Patent Owner

also requests that the its counsel be allowed to use computers at counsel's table, including consultation and running audio-visual presentations.

Date: January 11, 2023

Respectfully Submitted,

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Counsel for Patent Owner, BillJCo, LLC

Certification of Service Under 37 C.F.R. § 42.6(e)(4)

The undersigned hereby certifies that on January 11, 2023, I caused a true and correct copy of the NOTICE OF REQUEST FOR ORAL ARGUMENT to be served on the following counsel for Petitioner by electronic mail to the following email addresses:

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Date: January 11, 2023

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