

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC. AND JUNIPER NETWORKS, INC.<sup>1</sup>,  
Petitioners,

v.

ORCKIT CORPORATION,  
Patent Owner.

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Case IPR2023-00554  
U.S. Patent No. 10,652,111

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**PETITIONER CISCO SYSTEMS, INC.'S  
REQUEST FOR ORAL ARGUMENT**

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<sup>1</sup> IPR2024-00037 (Juniper Networks, Inc.) has been joined with this proceeding.

Pursuant to 37 C.F.R. § 42.70(a) and the Board’s September 20, 2023 Scheduling Order (Paper No. 9), Cisco Systems, Inc. (“Petitioner”) requests an opportunity to present oral argument regarding the unpatentability of Claims 1-9, 12-24 and 27-31 (the “Challenged Claims”) of U.S. Patent No. 10,652,111 (“the ’111 Patent”). Petitioner requests that the oral argument take place by videoconference. The oral argument is scheduled to be held on July 9, 2024. Paper No. 9 at 11. Without waiving consideration of any issue not identified below, Petitioner requests one hour to address the following issues:

1. That Claims 1-9, 12-24 and 27-31 of the ’111 Patent are obvious under 35 U.S.C. § 103 over Lin in view of Swenson and the knowledge of a POSA;
2. That Claims 1, 5-9, 12-24 and 27-30 of the ’111 Patent are obvious under 35 U.S.C. § 103(a) over Shieh in view of Swenson and the knowledge of a POSA;
3. Petitioner’s and Patent Owner’s Motions to Exclude Evidence, if any;
4. Rebuttal of any arguments made by Patent Owner, including any arguments raised in Patent Owner’s request for oral argument; and
5. Any additional issues on which the Board seeks clarification.

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

At oral argument, Petitioner intends to use audio/visual equipment to display demonstrative exhibits.

Dated: May 9, 2024

Respectfully submitted,

/Jeffrey D. Blake/  
Jeffrey D. Blake  
Registration No. 58,884

## CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. §§ 42.105 and 42.6, that service was made on the Patent Owner as detailed below.

<i>Date of service</i>	May 9, 2024
<i>Manner of service</i>	Email
<i>Documents served</i>	Petitioner's Request for Oral Argument
<i>Persons served</i>	James Carmichael Stephen McBride Minghui Yang CARMICHAEL IP, PLLC Email: <a href="mailto:jim@carmichaelip.com">jim@carmichaelip.com</a> <a href="mailto:stevemcbride@carmichaelip.com">stevemcbride@carmichaelip.com</a> <a href="mailto:mitch@carmichaelip.com">mitch@carmichaelip.com</a> <a href="mailto:Orckit-IPRs@carmichaelip.com">Orckit-IPRs@carmichaelip.com</a>  George Stamatopoulos Michael Ng KOBRE & KIM Email: <a href="mailto:George.Stamatopoulos@kobrekim.com">George.Stamatopoulos@kobrekim.com</a> <a href="mailto:Michael.Ng@kobrekim.com">Michael.Ng@kobrekim.com</a>

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