

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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QUALTRICS, LLC  
Petitioner

v.

OPINIONLAB, INC.  
Patent Owner

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Case IPR2014-00366  
U.S. Patent 8,041,805

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**PETITIONER QUALTRICS, LLC'S REQUEST FOR ORAL ARGUMENT**

**FILED VIA PRPS**

Petitioner Qualtrics, LLC respectfully requests oral argument under 37 CFR § 42.70. The PTAB has already scheduled an oral hearing for April 16, 2015 and stated that the hearing will be for five trials: IPR2014-00366 (the instant IPR), and IRP2014-00356, IPR2014-00406, IPR2014-00420, and IPR2014-00421. (Paper 16.) The five trials involve five related patents. Because of the overlapping issues, Qualtrics requests that the PTAB provide a consolidated oral argument for all five trials in which Qualtrics is given two hours to present its arguments. Qualtrics also requests permission to use a computer, projector, and screen to display possible demonstratives and exhibits.

For the instant IPR, Qualtrics specifies the following issues to be argued:

- I. The grounds on which the instant IPR trial was instituted, i.e.: claims 1, 2, 5, 8, 10, 11, 14, 17–19, 22, 25–27, 30, and 33 of the '805 Patent for obviousness over CustomerSat, Medinets, and the HTML Spec. This may include, for example, the level of ordinary skill in the art of the '805 Patent and claim construction of the terms of the '805 Patent.
- II. Patent Owner OpinionLab Inc.'s assertions regarding alleged secondary considerations of nonobviousness.
- III. Qualtrics's Motion to Exclude Evidence.
- IV. Any Motion to Exclude Evidence filed by OpinionLab.

Dated: February 27, 2015

By: /s/ Robert Steinberg  
Latham & Watkins LLP  
*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

Under 37 C.F.R. § 42.6(e) and the parties' agreement to electronic service on August 21, 2014, I certify that on February 27, 2015, a copy of:

**PETITIONER QUALTRICS, LLC'S REQUEST FOR ORAL ARGUMENT**

was served by e-mail on Patent Owner's lead and backup counsel, as follows:

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