Filed on behalf of TQ Delta, LLC

By: Peter J. McAndrews

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC., DISH NETWORK, LLC, COMCAST CABLE COMMUNICATIONS, LLC, COX COMMUNICATIONS, INC., TIME WARNER CABLE ENTERPRISES LLC, VERIZON SERVICES CORP., and ARRIS GROUP, INC., Petitioner.

v.

TQ DELTA, LLC Patent Owner

Case No. IPR2016-01006¹ Patent No. 7,835,430

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ DISH Network, L.L.C., who filed a Petition in IPR2017-00251, and Comcast Cable Communications, L.L.C., Cox Communications, Inc., Time Warner Cable Enterprises L.L.C., Verizon Services Corp., and ARRIS Group, Inc., who filed a Petition in IPR2017-00420, have been joined in this proceeding.



Pursuant to 37 C.F.R. § 42.70(a), Patent Owner TQ Delta, LLC requests oral argument on the following:

- (1) all instituted grounds for review, including whether the challenged claims are obvious in view of Milbrandt, Chang, Hwang and ANSI T1.413-1995 according to the arguments and evidence properly raised in the Petition, Patent Owner Response, Reply, and Patent Owner Motion for Observation;
- (2) Patent Owner Motion to Exclude (which is being filed concurrently with this paper); and
- (3) Patent Owner's listing (Paper No. 22) of new arguments raised and new evidence cited in Petitioners' Reply.

Patent Owner requests that oral argument for IPR2016-01006, IPR2016-01007, IPR2016-01008 and IPR2016-01009 be consolidated, since there are issues common to these proceedings. However, because the four proceedings and three challenged patents have certain unrelated and unique issues, Patent Owner requests **60** minutes per side. Addressing three patents in one oral argument will increase efficiency; however, it will require additional time than is typically allocated to a challenge directed to a single patent.

Patent Owner's Request for Oral Argument IPR2016-01006

Dated: July 5, 2017 Respectfully submitted,

/ Peter J. McAndrews/

Peter J. McAndrews Registration No. 38,547 McAndrews, Held & Malloy, Ltd. 500 West Madison Street, 34th Floor Chicago, Illinois 60661 Office: (312) 775-8000

Lead Counsel for Patent Owner



CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that a true and correct copy of the foregoing PATENT OWNER'S

REQUEST FOR ORAL ARGUMENT was served on July 5, 2017 via electronic

mail to counsel for Petitioner at the following:

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Patent Owner's Request for Oral Argument IPR2016-01006

Respectfully submitted,

Dated: July 5, 2017 /Peter J. McAndrews/

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