

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.,  
Petitioner

v.

INTELLECTUAL VENTURES II LLC  
Patent Owner

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Case IPR2016-01404  
U.S. Patent No. 6,968,459

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

*Mail Stop "Patent Board"*  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.70 and the Board's January 11, 2017 Scheduling Order (Paper 10), Patent Owner Intellectual Ventures II LLC respectfully requests oral argument, which is currently scheduled for October 5, 2017, on the issues raised in the Petition for *Inter Partes* Review of U.S. Patent 6,968,459 ("the '459 patent"), Patent Owner's Preliminary Response, Patent Owner's Response, Petitioner's Reply to Patent Owner's Response, Motions to Exclude and corresponding Oppositions and Replies (if filed), and Motion for Observations and corresponding Opposition (if filed). The issues to be argued include:

Construction of the term "*device-specific security information*" under the *Phillips* standard;

Claims 1, 13, 14, 33, 39, 46, and 48 as allegedly anticipated under 35 U.S.C. § 102(b) by Bensimon 1991; and

Claims 2 and 34 as allegedly obvious under 35 U.S.C. § 103(a) over Bensimon in view of Takahashi.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Lori A. Gordon/

Lori A. Gordon, Reg. No. 50,633  
Attorney for Patent Owner

Date: September 1, 2017

1100 New York Avenue, N.W.  
Washington, D.C. 20005  
(202) 371-2600

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served electronically via e-mail on September 1, 2017, in its entirety on the following:

Lionel M. Lavenue (Lead Counsel)  
James D. Stein (Back-up Counsel)  
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER LLP  
IV459-IPR@finnegan.com  
lionel.lavenue@finnegan.com  
James.Stein@finnegan.com

Roshan Suresh Mansinghani (Back-up Counsel)  
Jonathan Stroud (Back-up Counsel)  
UNIFIED PATENTS INC.  
roshan@unifiedpatents.com  
jonathan@unifiedpatents.com

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Lori A. Gordon/

Lori A. Gordon (Registration No. 50,633)  
Attorney for Patent Owner

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1100 New York Avenue, N.W.  
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