

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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U.S. Patent No. 6,968,459

IPR2016-01404

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70 and the Board's January 11, 2017 Scheduling Order (Paper 10), Petitioner Unified Patents, Inc. 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"), Petitioner's Reply to Patent Owner's Response and corresponding Oppositions and Replies (if filed), and Motion for Observations and corresponding Opposition (if filed). The issues to be argued include:

The Claimed "Device-specific Security Information" Need Not Be "Unique"  
Bensimon Anticipates Claims 1, 13, 14, 33, 39, 46, and 48

The Combination of Bensimon and Takahashi Renders Obvious Claims 2  
and 34.

Date: September 1, 2017

Respectfully submitted,

/James D. Stein/

James D. Stein, Reg. No. 63,782

**CERTIFICATE OF SERVICE**

Under 37 C.F.R. § 42.6(e), this is to certify that I served a true and correct copy of the **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served on September 1, 2017, via email directed to counsel of record for the patent owner at the following:

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Dated: September 1, 2017

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