

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TELESIGN CORPORATION
Petitioner,

v.

TWILIO INC.
Patent Owner

Case IPR2017-01977
Patent 8,755,376 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's March 9, 2018 Scheduling Order (Paper 13), Patent Owner, Twilio Inc., respectfully requests oral argument, currently scheduled on November 15, 2018. Pursuant to 37 C.F.R. § 42.70, Patent Owner requests the oral argument to discuss the issues raised in the parties' filings, including but not limited to, the following items:

1. Whether Petitioner has established a *prima facie* case of unpatentability;
2. The grounds of unpatentability, namely whether:
 - a. Maes in view of Ransom renders obvious claims 1-3, 14, 16, and 19;
 - b. Maes in view of Ransom and further in view of Jiang renders obvious claims 5 and 17;
 - c. ETSI ES 202 391-4 in view of Ransom renders obvious claims 1-3, 5, 14, and 16;
 - d. ETSI ES 202 391-4 in view of Ransom and further in view of ETSI ES 202 391-7 renders obvious claim 17; and
 - e. ETSI ES 202 391-4 in view of Ransom and further in view of ETSI ES 202 391-2 renders obvious claim 19.
3. Whether the challenged claims are non-obvious due to secondary considerations of non-obviousness;

4. Any issues identified in Petitioner's Request for Oral Argument;
5. Rebuttal to Petitioner's presentation on all matters;
6. Any other issues raised in papers filed in this proceeding, including Motions to Exclude and Motions to Strike; and
7. Any other issues that the Board deems necessary for issuing a final written decision.

Petitioner and Patent Owner stipulated to consolidate the oral hearings of this case with IPR-2017-01976. *See* Paper 15. Patent Owner requests 30 minutes of argument time for each of Petitioner and Patent Owner in the consolidated hearing to address the above-listed topics for both proceedings.

Additionally, Patent Owner respectfully requests the ability to use audio/visual equipment to display demonstrative exhibits and evidence of record, including the use of a computer, projector, and screen.

IPR2017-01977
U.S. Patent No. 8,755,376 B2

October 12, 2018

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Respectfully submitted,
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/Wayne O. Stacy/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on October 12, 2018, the foregoing was served electronically via email on the following:

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