

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

UNILOC 2017 LLC,
Patent Owner.

Case IPR2019-00251
Patent 6,993,049 B2

REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board’s Scheduling Order (Paper 8), Petitioner¹ submits this Request for Oral Argument on all of the instituted grounds against the Challenged Claims of U.S. Patent No. 6,993,049. Petitioner requests 60 minutes for each side (120 minutes total) to present arguments for this proceeding.

Specifically, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. The claim construction of “additional data field,” “inquiry message,” and “broadcasting”;
2. The obviousness of claims 11 and 12 in view of Larsson;
3. The obviousness of claims 11 and 12 in view of Larsson and BT Core;
4. The obviousness of claims 11 and 12 in view of IrOBEX;
5. The printed publication status of BT Core and IrOBEX;
6. Patent Owner’s improper introduction of new evidence and arguments related to piggybacking in page 19, line 10 to page 20, line 15 of its sur-reply;

¹ LG Electronics, Inc., who filed a petition in IPR2019-01530, has been joined as a petitioner in this proceeding. *LG Electronics v UNILOC 2017*, IPR2019-01530, Paper 8 (March 3, 2020).

7. Rebuttal to Patent Owner's presentation on all matters; and
8. Any additional issues on which the Board seeks clarification.

Petitioner also respectfully requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen that connects to a laptop computer. Petitioner's counsel will use a laptop computer with a VGA-type connector. In addition, Petitioner requests that an ELMO-type projector be made available for use.

Respectfully submitted,

Dated: March 12, 2020

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