

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

PARUS HOLDINGS, INC.,
Patent Owner.

Case No. IPR2020-00686
U.S. Patent No. 7,076,431

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)**

Pursuant to 37 C.F.R. § 42.70(a) and the Board's September 23, 2020 Scheduling Order (Paper 10), Patent Owner Parus Holdings, Inc. ("Patent Owner") submits this Request for Oral Argument and respectfully requests an opportunity to present oral argument on all issues in this proceeding. Oral argument in this proceeding is presently scheduled for June 22, 2021, together with oral argument in IPR2020-00687. Given the similarity of the issues in both proceedings, Patent Owner requests that the Board authorize the parties to present their arguments in a single, consolidated hearing.

Patent Owner intends to address at least the following issues during oral argument:

1. All grounds on which trial was instituted, including all issues raised by the parties' papers;
2. Any issue raised by either party in a request for oral argument, a motion to exclude, objections to demonstrative exhibits (if any), or any other motion or paper filed by either party before oral argument;
3. Rebuttal to any issue raised by Petitioner in its presentation at the oral argument; and
4. Any additional issue on which the Board seeks clarification.

Patent Owner requests that each side be provided 45 minutes of argument time for the consolidated hearing in these proceedings, inclusive of any rebuttal time

either party wishes to reserve at the hearing. If oral argument takes place via live testimony at USPTO offices, Patent Owner also respectfully requests the ability to use audio-visual equipment to display demonstratives and exhibits, including the use of a computer, projector, ELMO, and screen. Should oral argument be conducted remotely by video or telephone, Patent Owner requests that appropriate audio-visual alternatives, including the use of an online slide deck of demonstratives, be allowed.

Respectfully submitted,

/Michael J. McNamara/

Michael J. McNamara (Reg. No. 52,017)

Michael T. Renaud (Reg. No. 44,299)

William A. Meunier (Reg. No. 41,193)

Andrew H. DeVoogd (*pro hac vice* to be filed)

MINTZ, LEVIN, COHN, FERRIS, GLOVSKY
AND POPEO, P.C.

One Financial Center

Boston, MA 02111

Telephone: 617-348-1884

Facsimile: 617-542-2241

E-mails: mmcnamara@mintz.com

mtrenaud@mintz.com

wameunier@mintz.com

ahdevoogd@mintz.com

Dated: May 12, 2021

CERTIFICATE OF SERVICE

I certify that a copy of Patent Owner's Request for Oral Argument Pursuant to 37 C.F.R. § 42.70(a) is being served by electronic mail on the following counsel of record:

Lead Counsel

Jennifer C. Bailey (Reg. No. 52,583)
ERISE IP, P.A.
7015 College Blvd., Ste. 700
Overland Park, Kansas 66211
Telephone: (913) 777-5600
Facsimile: (913) 777-5601
Jennifer.Bailey@eriseip.com

Backup Counsel

Adam P. Seitz (Reg. No. 52,206)
ERISE IP, P.A.
7015 College Blvd., Ste. 700
Overland Park, Kansas 66211
Telephone: (913) 777-5600
Facsimile: (913) 777-5601
Adam.Seitz@eriseip.com

Dated: May 12, 2021

/Michael J. McNamara/

Michael J. McNamara (Reg. No. 52,017)