

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

PARUS HOLDINGS, INC.,
Patent Owner

Case IPR2020-00686

U.S. Patent No. 7,076,431

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's September 23, 2020, Scheduling Order (Paper 10), Petitioner respectfully requests oral argument for the trial currently scheduled on June 22, 2021. Petitioner requests oral argument for this IPR (IPR2020-00686) be combined with oral argument for IPR2020-00687 (for which a Request for Oral Argument is concurrently filed). The '431 Patent, which is the subject of this '686 IPR, is related to the '084 Patent, which is the subject of the '687 IPR. The issues presented in the IPRs are similar, warranting a single oral argument for both IPRs. Petitioner also requests a single set of demonstratives be used for both IPRs and a total Petitioner argument time of 45 minutes. If the Board is allowing in-person hearings, Petitioner further requests that the hearing take place in Alexandria, Virginia.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

1. Whether Claims 1-6, 9-10, 13-14, 18, 20-21, and 25 are unpatentable under § 103(a) over U.S. Patent No. 6,269,336 B1 to Ladd, et al. ("Ladd") in view of Japanese Unexamined Utility Patent Application Publication No. H9-311869 to Kurosawa ("Kurosawa") in further view of U.S. Patent No. 6,393,423 B1 to Goedken ("Goedken");

2. Whether Claims 7, 19, and 26-30 are unpatentable under § 103(a) over *Ladd* in view of *Kurosawa* in further view of *Goedken* and U.S. Patent No. 5,913,214 to Madnick, et al (“Madnick”);

3. Whether Claims 5-6 are unpatentable under § 103(a) over *Ladd* in view of *Kurosawa* in further view of *Goedken* and U.S. Patent No. 5,774,859 to Houser, et al. (“Houser”);

4. Whether Claims 9 and 25 are unpatentable under § 103(a) over *Ladd* in view of *Kurosawa* in further view of *Goedken* and U.S. Patent No. 6,650,998 B1 to Rutledge, et al. (“Rutledge”);

5. Any claim constructions raised in the Petition or Petitioner Reply, the Patent Owner Preliminary Response, Patent Owner Response, or the Patent Owner Sur-Reply, or the Board’s Institution Decision;

6. Any issues specified in the Patent Owner Response and Patent Owner Sur-Reply;

7. Any issues specified in the Petitioner Reply;

8. Any issues regarding motions to exclude or motions to strike that may be filed or pending; and

9. Any issues otherwise raised by the Board.

Respectfully submitted,

ERISE IP, P.A.

BY: /s/ Jennifer C. Bailey

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ATTORNEYS FOR PETITIONER
APPLE INC.

CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.6

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on May 12, 2021, the foregoing *Petitioner's Request for Oral Argument* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

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