

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SONY INTERACTIVE ENTERTAINMENT LLC,  
Petitioner,

v.

BOT M8, LLC,  
Patent Owner.

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Case IPR2020-01288  
U.S. Patent No. 7,664,988

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a) and the Board's February 16, 2021, Scheduling Order (Paper 12), Patent Owner, Bot M8, LLC ("Patent Owner"), requests the opportunity to present oral argument in this matter. The oral argument is scheduled to be held on November 10, 2021. Paper 12 at 10.

Patent Owner requests that each side be allocated sixty (60) minutes, which includes up to fifteen (15) minutes for sur-rebuttal. Without waiving consideration of any issue not identified below, the hearing will address the following issues:

1. Whether Petitioner has met its burden of proving that Claims 1–9 of the '988 Patent are unpatentable as obvious over:
  - a. the combination of *Sugiyama* and *Gatto*, or
  - b. the combination of *Morrow '952* and *Morrow '771*;
2. Whether Petitioner has met its burden of proving that Claims 2 and 7 of the '988 Patent are unpatentable as obvious over the combinations of either *Sugiyama* and *Gatto*, or *Morrow '952* and *Morrow '771*, in view of *Yamaguchi*;
3. Whether Petitioner has met its burden of proving that Claim 8 of the '988 Patent is unpatentable as obvious over the combinations of either *Sugiyama* and *Gatto*, or *Morrow '952* and *Morrow '771*, in view of *Yamaguchi* and *Proudler*;

4. Whether Petitioner has met its burden of proving that Claim 10 of the '988 Patent is unpatentable as obvious over the combinations of either *Sugiyama* and *Gatto*, or *Morrow '952* and *Morrow '771*, in view of *Cheston*;
5. Patent Owner's and Petitioner's Motion to Exclude Evidence, if any;
6. Rebuttal of any arguments made by Petitioner;
7. Any additional issues on which the Board seeks clarification; and
8. Response to any issues Petitioner raises in its Request for Oral Argument.

Patent Owner respectfully reserves the right to supplement and/or amend the foregoing statement of issues to the extent the Rules permit.

Petitioner is the party with the burden of proof and will present first at the oral hearing. Patent Owner will address any issues raised by Petitioner, or questions raised by the Board during presentation.

Patent Owner understands it is likely that oral argument will be conducted remotely by video or telephone in view of the ongoing COVID-19 coronavirus pandemic. In the event that oral argument is conducted in-person, Patent Owner requests the use of audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen.

IPR2020-01288 (U.S. Patent No. 7,664,988)  
Patent Owner's Request for Oral Argument

Respectfully submitted,

Dated: October 1, 2021

/James Hannah/

James Hannah (Reg. No. 56,369)  
Kramer Levin Naftalis & Frankel LLP  
990 Marsh Road  
Menlo Park, CA 94025  
Tel: 650.752.1700 Fax: 650.752.1800

Jonathan S. Caplan (Reg. No. 38,094)  
Jeffrey H. Price (Reg. No. 69,141)  
Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Tel: 212.715.7502 Fax: 212.715.8000

(Case No. IPR2020-01288)

*Attorneys for Patent Owner*

## CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on the Petitioner as detailed below.

*Date of Service*            October 1, 2021

*Manner of Service*        Electronic Mail  
(eric.buresh@eriseip.com;  
jason.mudd@eriseip.com;  
callie.pendergrass@eriseip.com; and  
ptab@eriseip.com)

*Documents Served*        PATENT OWNER'S REQUEST  
FOR ORAL ARGUMENT

*Persons Served*            Eric A. Buresh  
Jason R. Mudd  
Callie A. Pendergrass

/James Hannah/  
James Hannah  
Registration No. 56,369  
Lead Counsel for Patent Owner