

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC., , CISCO SYSTEMS, INC.,
and KEYSIGHT TECHNOLOGIES, INC.,
Petitioners,*

v.

CENTRIPETAL NETWORKS, INC.,
Patent Owner.

Case IPR2022-00182
U.S. Patent No. 9,917,856

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

* Cisco Systems, Inc. filed a petition and a motion for joinder in IPR2022-01151 and has been joined as a petitioner in this proceeding. Keysight Technologies, Inc. filed a petition and a motion for joinder in IPR2022-01199 and has been joined as a petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner Centripetal Networks Inc. ("Patent Owner") respectfully requests oral argument. The oral argument is presently scheduled for February 15, 2023. See Paper 26 at 3. The issues to be argued include the following:

1. Whether Petitioners have met their burden of proving that Challenged Claims 1, 24, and 25 of the '856 Patent are unpatentable as obvious over Buruganahalli;
2. Whether Petitioners have met their burden of proving that Challenged Claims 1, 24, and 25 of the '856 Patent are unpatentable as obvious over Buruganahalli and Baehr;
3. Any claim construction disputes raised by the parties;
4. Whether Petitioner's Reply exceeded the permissible scope of reply and added new theories;
5. Patent Owner's and Petitioner's Motion to Exclude Evidence, if any;
6. Any additional issues on which the Board seeks clarification; and
7. Rebuttal of any arguments made by Petitioner.

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

Patent Owner's Request for Oral Argument
IPR2022-00182 (U.S. Patent No. 9,917,856)

Respectfully submitted,

Dated: January 11, 2023

/James Hannah/
James Hannah (Reg. No. 56,369)
Jenna Fuller (Reg. No. 74,212)
Paul Andre (*pro hac vice* pending)
Kramer Levin Naftalis & Frankel LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Tel: (650) 752-1700 Fax: (650)752-1800

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)715-8302

Scott M. Kelly (Reg. No. 65,121)
Bradley C. Wright (Reg. No. 38,061)
John R. Hutchins (Reg. No. 43,686)
BANNER & WITCOFF, LTD.
1100 13th Street, NW, Suite 1200
Washington, DC 20005
Tel: (202) 824-3000 Fax: (202) 824-3001

(Case No. IPR2022-00182)

Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on January 11, 2023, in accordance with 37

C.F.R. § 42.6(e), a copy of PATENT OWNER'S REQUEST FOR ORAL

ARGUMENT was served via electronic mail on Petitioners as detailed below.

Scott A. McKeown
Mark D. Rowland
James Batchelder
Andrew Radsch
Keyna Chow
ROPES & GRAY LLP
scott.mckeown@ropesgray.com
mark.rowland@ropesgray.com
james.batchelder@ropesgray.com
andrew.radsch@ropesgray.com
keyna.chow@ropesgray.com

Counsel for Palo Alto Networks, Inc.

Gerard M. Donovan
Peter J. Chassman
Jonathan I. Detrixhe
Sidharth Kapoor
REED SMITH LLP
gdonovan@reedsmith.com
pchassman@reedsmith.com
jdetrixhe@reedsmith.com
skapoor@reedsmith.com

Counsel for Keysight Technologies,
Inc.

Theodore M. Foster
David L. McCombs
Gregory P. Huh
HAYNES AND BOONE, LLP
ipr.theo.foster@haynesboone.com
david.mcombs.ipr@haynesboone.com
gregory.huh.ipr@haynesboone.com

Counsel for Cisco Systems, Inc.

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