

Case IPR2023-00274
U.S. Patent No. 8,713,289

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LZLABS GMBH,
Petitioner

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION
Patent Owner

IPR2023-00274

U.S. Patent No. 8,713,289

INTERNATIONAL BUSINESS MACHINES CORPORATION'S
REQUEST FOR ORAL ARGUMENT

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-145

Pursuant to 37 C.F.R. § 42.70(a) and the Board’s June 16, 2023, Scheduling Order (Paper 8), Petitioner International Business Machines Corporation (“IBM”) respectfully requests oral argument for the trial currently scheduled on March 21, 2024. IBM respectfully requests a remote oral argument with 60 minutes per side.

IBM specifies the following issues to be argued:

- Issues related to the Board’s Decision Instituting *Inter Partes* Review (Paper 7);
- Whether Claims 1, 4, 6, 10, 11 and 16 are unpatentable under 35 U.S.C. § 103 as obvious over Loderer (Ground 1);
- Whether Claims 1-4, 6, 10-12, 16 and 17 are unpatentable under 35 U.S.C. § 103 as obvious over Loderer in view of Enterprise Systems Architecture/390 Principles of Operation (“PoO”), Kane and the knowledge of a POSA (Ground 2);
- Response to any issues specified by Patent Owner in its Response and Sur-Reply;
- Response to any issues specified by Patent Owner in its request for oral argument;
- Any issues raised in the briefing pursuant to the schedule; and
- Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Additionally, IBM reserves the right to address any arguments presented by Patent Owner and any other issues about which the Board wishes to hear arguments during the oral hearing.

IBM also requests permission to use audio and visual equipment to display demonstratives and exhibits remotely during the oral hearing.

Dated: February 2, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a complete copy of the foregoing was served on counsel of record for the Petitioner by filing this document through P-TACTS and by sending this document via electronic mail to the following addresses:

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