UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner

v.

FLYPSI, INC.,
Patent Owner

Case No. IPR2023-00359
Patent No. 11,012,554

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order dated July 31, 2023 (Paper 10), Petitioner Google LLC requests Oral Argument on issues related to the patentability of challenged claims 1-4 of U.S. Patent No. 11,012,554 ("the '554 patent"). Petitioner wishes to present argument on the following issues:

- Grounds for which *inter partes* review was instituted for the '554 patent and any issue raised in the Board's Institution Decision dated July 31, 2023 (Paper 9);
- Any issue addressed in Petitioner's papers, including, but not limited to, the Petition and Petitioner's Reply Brief; and
- Rebuttal to Patent Owner's presentation on all issues, including the issues listed above and any issues raised in Patent Owner's Response and Patent Owner's Sur-Reply.

The Board previously scheduled the Oral Hearing for May 7-8, 2024, for IPR2023-00357, IPR2023-00358, IPR2023-00359, IPR2023-00360, and IPR2023-00361. (Paper 10 at 13.) Petitioner believes the parties should be allocated 120 minutes per side to present arguments in a consolidated hearing for all five proceedings. Given the time requested and to the extent possible and convenient for the Board, Petitioner requests that the Oral Hearing be held on May 7, 2024.

In terms of location, Petitioner recognizes that members of the Board panel may be located in different geographic locations. As such, Petitioner is amenable to either an in-person hearing or a remote hearing, and defers to the Board's preference.

Respectfully submitted,

Dated: March 21, 2024

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024, I caused a true and correct copy of the foregoing Petitioner's Request for Oral Argument to be served electronically on counsel for Patent Owner at the following addresses:

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