UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOHO CORPORATION and
ZOHO CORPORATION PVT., LTD.
Petitioners,

v.

MEETRIX IP, LLC,
Patent Owner.

Case IPR2023-00378
U.S. Patent No. 9,094,525
(Claims 1-8)

PETITIONERS' REQUEST FOR ORAL ARGUMENT

TABLE OF EXHIBITS

Ex.	Description
1001	U.S. Patent No. 9,094,525 ("the '525 patent")
1002	Patent Assignments for the '525 patent
1003	Declaration of Dr. Henry H. Houh
1004	*Curriculum Vitae* for Dr. Henry H. Houh
1005	File History of Application No. 13/674,233 (the '233 application)
1006	U.S. Patent No. 7,180,997 ("Knappe")
1007	U.S. Patent No. 6,690,654 ("Elliott")
1008	U.S. Patent No. 7,089,285 ("Drell")
1010	Guichard *et al*., "MPLS and VPN Architectures, A practical guide to understanding, designing and deploying MPLS and MPLS-enabled VPNs," Cisco Press, 2001 ("VPN Textbook")
1011	Declaration of Ingrid Hsieh-Yee, Ph.D., under 37 C.F.R. § 1.68
1012	U.S. Patent No. 3,060,265
1013	U.S. Patent No. 4,139,731
1014	U.S. Patent No. 3,601,530
1015	U.S. Patent No. 4,796,293
1016	A Primer on the T.120 Series Standard
1017	T.120 Standard (1996)
1018	U.S. Patent No. 6,237,025
1019	U.S. Patent No. 6,782,413
1020	U.S. Patent No. 6,980,526

Ex.	Description
1021	Caputo, "Cisco Packetized Voice & Data Integration," McGraw-Hill, 2000
1022	De Moraes *et al.*, "The Internet Multicast from ITS: How it was Done and Implications for the Future," IEEE Communications Magazine, January 1995
1023	U.S. Patent Publication No. 2004/0261116 A1
1024	U.S. Patent No. 6,850,496
1025	U.S. Patent No. 6,553,515
1026	U.S. Patent No. 6,633,848
1027	Computer Desktop Encyclopedia
1036	U.S. Patent No. 6,215,515 ("Voois")
1046	Declaration of C.J. Alice Chuang
1047	Declaration of Carolyn Chang
1048	Declaration of Ryan Marton

Pursuant to 37 C.F.R. § 42.70(a) and the Board's July 20, 2023 Scheduling Order (Paper 7), Petitioners Zoho Corporation and Zoho Corporation Pvt. Ltd. (collectively "Petitioners" or "Zoho") hereby request a combined oral argument on the issues set forth below regarding cancellation of claims in U.S. Patent Nos. 8,339,997 ('997 patent) and 9,094,525 ('525 patent) at a time set by the Board. Oral argument for IPR2023-00371, IPR2023-00378, and IPR2023-00379 is presently scheduled for April 23, 2024.

Petitioners respectfully request a total of 120 minutes of argument time in which Petitioner may present its arguments for IPR2023-00371, IPR2023-00378, and IPR2023-00379. Petitioners submit that it would be an efficient use of the Board's and the parties' time to set a single oral argument time for the issuet set forth below relating to the '997 and '525 patents together.

Petitioner requests the oral argument be conducted virtually by videoconference.

Petitioner requests oral argument on all issues raised in the parties' filings, including but not limited to the following:

(1) Whether claims 1 and 3-7 of the '997 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, VPN Textbook, and de Moraes;

(2) Whether claims 2 and 8-10 of the ’997 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, VPN Textbook, de Moraes, and Shepherd;

(3) Whether claims 1-4 of the ’525 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Drell, Knappe, and Voois;

(4) Whether claims 5-8 of the ’525 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Drell, Knappe, Voois, Elliott, and VPN Textbook;

(5) Whether claims 1-4 of the ’525 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Drell and Knappe;

(6) Whether claims 5-8 of the ’525 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Drell, Knappe, Elliott, and VPN Textbook;

(7) Whether claims 9-20 of the ’525 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Drell, Knappe, and Elliott; and

(8) Rebuttal to Patent Owner’s presentation on all matters.

Respectfully submitted,

Date: March 11, 2024

By: /Hector Ribera/

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CERTIFICATE OF SERVICE

The undersigned certifies that on March 11, 2024, a complete and entire copy of this PETITIONERS' REQUEST FOR ORAL ARGUMENT and any supporting exhibits were provided via electronic mail (by consent) to the Patent Owner by serving the correspondence address identified in the Mandatory Notices:

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