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 IPR2023-00382
U.S. Patent No. 9,843,612
(Claims 19-29)

PETITIONERS' REQUEST FOR ORAL ARGUMENT

TABLE OF EXHIBITS

Ex.	Description
1001	U.S. Patent No. 9,843,612 ("the '612 patent")
1002	Patent Assignments for the '612 patent
1003	Declaration of Dr. Henry H. Houh
1004	*Curriculum Vitae* for Dr. Henry H. Houh
1005	File History of Application No. 14/984,709 (the '709 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
1033	H.323 Standard
1034	US Patent No. 7,266,091
1035	US Patent No. 5,606,550
1040	WO2001018665 ("Hendricks")
1041	U.S. Patent No. 6,768,914
1042	U.S. Patent No. 6,501,740
1043	U.S. Patent No. 6,424,647
1044	U.S. Patent No. 6,961,416
1045	U.S. Patent No. 6,011,851
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. 9,253,332 ('332 patent) and 9,843,612 ('612 patent) at a time set by the Board. Oral argument for IPR2023-00377, IPR2023-00380, and IPR2023-00382 is presently scheduled for April 25, 2024.

Petitioners respectfully request a total of 120 minutes of argument time in which Petitioners may present its arguments for IPR2023-00377, IPR2023-00380, and IPR2023-00382. 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 issues set forth below relating to the '332 and '612 patents together.

Petitioners request the oral argument be conducted virtually by videoconference.

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

(1) Whether claims 1-2, 4-5 and 7 of the '332 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, and VPN Textbook;

(2) Whether claims 3, 6 and 8-11 of the ’332 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, VPN Textbook, and Drell;

(3) Whether claim 12 of the ’332 patent is unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, VPN Textbook, Drell, and Hoke

(4) Whether claims 10-18 of the ’612 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Drell, Knappe, Elliott, Hendricks, and Doganata;

(5) Whether claims 19-21 and 25-27 of the ’612 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, VPN Textbook, and Hendricks;

(6) Whether claims 22-24 and 28-29 of the ’612 patent are unpatentable under 35 U.S.C. § 103 as having been obvious over Knappe, Elliott, VPN Textbook, Hendricks, and Drell; and

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

Respectfully submitted,

Date: March 11, 2024

By: /Hector Ribera/

Hector J. Ribera (Reg. No. 54,397)
548 Market St., Suite 36117, San Francisco, CA 94104
Email: hector@martonribera.com
Tel: (415) 360-2511

Attorneys for Petitioner

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:

Gregory S. Donahue
Andrew G. DiNovo
DiNovo Price LLP
7000 North MoPac Expressway
Suite 350
Austin, Texas 78731
Telephone: (512) 539-2626
Facsimile: (512) 539-2627

gdonahue@dinovoprice.com
adinovo@dinovoprice.com
docketing@dinovoprice.com

Date: March 11, 2024

By: /Hector Ribera/

Hector J. Ribera (Reg. No. 54,397)
548 Market St., Suite 36117, San Francisco, CA 94104
Email: hector@martonribera.com
Tel: (415) 360-2511

Attorneys for Petitioners