

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC, and JPMORGAN CHASE BANK, N.A.¹

Petitioner,

v.

DYNAPASS IP HOLDINGS, LLC

Patent Owner.

***Inter Partes* Review No. IPR2023-00425**

Patent No. 6,993,658

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Filed on behalf of Patent Owner by:

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WILLIAMS SIMONS & LANDIS PLLC

¹ JPMorgan Chase Bank N.A. was joined as a party to this proceeding via Motion for Joinder in IPR2023-01331.

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 (a), Patent Owner hereby respectfully requests an oral argument in IPR2023-00425. Pursuant to the Board's Scheduling Order (Paper 10), the oral argument is scheduled for April 16, 2024. Patent Owner respectfully requests a remote hearing to avoid the unnecessary expenditure of party resources. Patent Owner requests that each party be provided with one hour of argument time.

Specifically, but not by way of waiver of any unenumerated issues, Patent Owner requests oral argument to address the following:

- I. The grounds on which the IPR of the '658 Patent was instituted, including the issues and evidence raised in the parties' briefing and supporting declarations and exhibits;
- II. Any issues specified by Petitioner in its request for oral argument;
- III. Rebuttal to Petitioner's presentation on all matters;
- IV. Any procedural and evidentiary issues raised by the parties;
- V. Any additional issues the parties raise or propose to raise at or before the oral argument; and
- VI. Any additional issues on which the Board seeks information or clarification.

DATED: March 5, 2024

Respectfully submitted,

By: /John Wittenzellner/

John Wittenzellner
Registration No. 61,662
Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on March 5, 2024, the foregoing document was served on counsel of record for Petitioner by filing this document through the End-to-End System, as well as via electronic mail to counsel of record for Petitioner at the following addresses: Timothy J. Murphy (tj@unifiedpatents.com), Jordan M. Rossen (jordan@unifiedpatents.com), How-Ying Liou (aliou@jonesday.com), Vishal Khatri (vkhatri@jonesday.com), Matthew Johnson (mwjohnson@jonesday.com), and Evan Tassis (etassis@jonesday.com).

Respectfully submitted,

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