

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROOFR INC.,
Petitioner

v.

PICTOMETRY INTERNATIONAL CORP.,
Patent Owner

Case IPR2023-00436
U.S. Patent No. 9,183,538

PATENT OWNER'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 22313-1450

Pursuant to the Board's July 21, 2023, Scheduling Order (Paper 15), Patent Owner Pictometry International Corp. ("Patent Owner"), respectfully requests oral argument, currently scheduled for April 23, 2024. Patent Owner requests one hour in which to present its arguments. Under 37 C.F.R. § 42.70, and without intending to waive any issue not specifically identified, Patent Owner specifies the following issues to be argued:

1. Whether claims 1-5 and 8-13 are unpatentable under 35 U.S.C. § 103(a) over Pershing-789 and Bailey;
2. Whether claims 6-7 and 14-18 are unpatentable under 35 U.S.C. § 103(a) over Pershing-789, Bailey, and Abhyanker;
3. Whether claims 1-5 and 8-13 are unpatentable under 35 U.S.C. § 103(a) over Kennedy and Bailey;
4. Claims 6-7 and 14-18 are unpatentable under 35 U.S.C. § 103(a) over Kennedy, Bailey, and Abhyanker;
5. Any issues specified by Petitioner Roofr, Inc. in its Request for Oral Argument; and
6. Any other issues the Board deems necessary for issuing a final written decision (e.g., any motion to exclude evidence and any motion to seal evidence).

Patent Owner also requests that the Board provide audio-visual equipment to

display demonstrative exhibits, including a projector and screen for displaying documents from a computer.

Further, Patent Owner requests that the hearing be held at the USPTO's Alexandria, Virginia office because that location will be more convenient, have simpler logistics, and be less costly for Patent Owner. Patent Owner notes that its counsel are located in the Washington, DC area.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jonathan Tuminaro/

Jonathan Tuminaro
Registration No. 61,327
Counsel for Patent Owner

Date: March 12, 2024

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served in its entirety on March 12, 2024 upon the following parties via electronic mail:

James M. Glass (Lead Counsel) jimglass@quinnemanuel.com
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Respectfully submitted,

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