

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KEYSIGHT TECHNOLOGIES, INC.,
Petitioner,

v.

CENTRIPETAL NETWORKS, LLC,
Patent Owner.

Case IPR2023-00448
U.S. Patent No. 11,012,474

PATENT OWNER'S REQUEST FOR ORAL HEARING

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, Centripetal Networks, LLC (“Patent Owner”), requests the opportunity to present oral argument in this matter. The oral argument is presently scheduled for April 22, 2024. *See* Paper 8 at 11.

Patent Owner prefers an in-person hearing and requests that each side be allowed a total of 45 minutes for arguments, with the opportunity to reserve a portion of that time for rebuttal.

The issues to be argued with respect to IPR2023-000448 include the following:

1. Whether Petitioner has met its burden of proving that Challenged Claims 1-3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-27, 29-31, and 33 of U.S. Patent No. 11,012,474 (the “’474 Patent”) are unpatentable as obvious over Law in view of Golnabi;
2. Whether Petitioner has met its burden of proving that Challenged Claims 2, 10, 18, and 26 of the ’474 Patent are unpatentable as obvious over Law in view of Golnabi and Wood;
3. Whether Petitioner has met its burden of proving that Challenged Claims 4, 12, 20, and 28 of the ’474 Patent are unpatentable as obvious over Law in view of Golnabi and Ke;

4. Whether Petitioner has met its burden of proving that Challenged Claims 5, 13, 21, and 29 of the '474 Patent are unpatentable as obvious over Law in view of Golnabi and Jungck;
5. Whether Petitioner has met its burden of proving that Challenged Claims 7-8, 15-16, 23-24, and 31-32 of the '474 Patent are unpatentable as obvious over Law in view of Golnabi and Johnson;
6. Any claim construction disputes raised by the parties;
7. Patent Owner's and Petitioner's Motion to Exclude Evidence, if any;
8. Any additional issues on which the Board seeks clarification; and
9. Rebuttal of any arguments made by Petitioner.

Petitioner is the party with the burden of proof and will present first at the oral hearing. Patent Owner will address any issues raised by Petitioner, or questions raised by the Board during presentation. Patent Owner also respectfully reserves the right to supplement and/or amend the foregoing statement of issues to the extent the Rules permit.

Respectfully submitted,

Dated: March 11, 2024

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Request for Oral Hearing
IPR2023-00448 (U.S. Patent No. 11,012,474)

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Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, that service was made on Petitioner as detailed below.

<i>Date of service</i>	March 11, 2024
<i>Manner of service</i>	Electronic Filing with the Board
<i>Documents served</i>	PATENT OWNER’S REQUEST FOR ORAL HEARING
<i>Persons Served</i>	REED SMITH LLP Gerard M. Donovan Peter J. Chassman Jonathan I. Detrixhe Sidharth Kapoor gdonovan@reedsmith.com pchassman@reedsmith.com jdetrixhe@reedsmith.com skapoor@reedsmith.com

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