

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC.
AND MOTOROLA MOBILITY LLC,
Petitioners,

V.

THETA IP, LLC,
Patent Owner.

IPR2023-00697
U.S. Patent No. 10,129,825

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Scheduling Order Patent Owner Theta IP, LLC respectfully requests oral argument for IPR2023-00697, currently scheduled for July 24, 2024. Theta requests that the hearing be scheduled together with co-pending IPR2023-00698.

Theta anticipates that it will present oral argument on the following issues:

1. Claims 1, 3, and 8 are not anticipated by European Patent Application No. 0 999 649 A2 (“Rauhala”) (Ex. 1004) (Ground 1);
2. Claim 4 would not have been obvious in view of Rauhala in view of Japanese Patent Application Publication No. 08228118A (“Masaaki”) (Ex. 1005) (Ground 2);
3. Any claim construction issues associated with the foregoing;
4. Rebuttal to issues raised by Petitioner; and
5. To the extent necessary, any motion to exclude or other motion filed by either party.

Theta requests 120 minutes in total, with 60 minutes per side, for oral argument for IPR2023-00697 and co-pending IPR2023-00698.

Theta also requests that the hearing be held remotely, via videoconference.

Dated: June 11, 2024

/s/ Aaron R. Hand
Aaron R. Hand, Lead Counsel

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(*pro hac vice*)

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

Petitioner has consented to e-mail service in this proceeding. Pursuant to 37 C.F.R. §42.6, the undersigned certifies that on June 11, 2024, a copy of the foregoing document was served by email upon the following counsel at the below email addresses:

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