

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PALO ALTO NETWORKS, INC.

Petitioner

v.

BT AMERICAS INC.

Patent Owner.

Case IPR2023-00889

Patent 7,895,641

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner BT Americas Inc. hereby requests oral argument, currently scheduled for August 21, 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 1-7 and 15-17 of U.S. Patent No. 7,895,641 (“the ‘641 patent”) are unpatentable under 35 U.S.C. § 103 over Duvall and Chu;
2. Whether claims 7-13 and 16 of the ‘641 patent are unpatentable under 35 U.S.C. § 103 over Duvall, Chu, and Trcka;
3. Whether claims 14-15 of the ‘641 patent are unpatentable under 35 U.S.C. § 103 over Duvall, Chu, Trcka, and Ziese;
4. Whether claims 18-25 of the ‘641 patent are unpatentable under 35 U.S.C. § 103 over Duvall, Chu, and Cogger;
5. Patent Owner’s responses to and addressing of Petitioner’s new interpretations, arguments, and rationales set forth in Petitioner’s Reply to Patent Owner’s Preliminary Response;
6. Patent Owner’s responses to and addressing of Petitioner’s new interpretations, arguments, and rationales set forth in Petitioner’s Reply to Patent Owner Response;

7. Patent Owner's responses to and addressing of joint claim construction briefing in co-pending litigation *British Telecommunications PLC and BT Americas, Inc. v. Palo Alto Networks, Inc.*, 1:22-cv-01538-CJB (D. Del.);
8. All instituted grounds for which the PTAB's Institution Decision found that Petitioner established a reasonable likelihood that it would prevail in establishing unpatentability;
9. All arguments and issues raised in Patent Owner's Preliminary Response, Patent Owner's Sur-Reply prior to institution, Patent Owner's Response, and Patent Owner's Sur-Reply;
10. All arguments and issues raised by Petitioner in the Petition, Petitioner's Reply to Patent Owner's Preliminary Response, and Petitioner's Reply to Patent Owner Response;
11. Any issues specified by Petitioner in its Request for Oral Argument; and
12. Any other issues the Board deems necessary for issuing a final written decision.

Patent Owner also requests that the Board provide audiovisual equipment to display demonstrative exhibits, including a projector and screen for displaying documents from a computer.

IPR2023-00889

U.S. Patent No. 7,895,641

Further, Patent Owner requests that the hearing be held in-person at the USPTO's Alexandria, Virginia office.

Respectfully submitted,

Dated: July 5, 2024

/Jonathan A. Roberts/

Jonathan A. Roberts (Reg. No. 68,565)
NIXON & VANDERHYE P.C.
901 N. Glebe Road, 11th Floor
Arlington, VA 22203

*Counsel for Patent Owner
BT Americas Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Patent Owner's Request for Oral Argument was served on Petitioner on July 5, 2024, by emailing a copy to counsel at the email addresses listed below:

Jonathan Tuminaro
Daniel S. Block
Michael D. Specht
Steven M. Pappas
STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.
1100 New York Avenue, N.W.
Washington, D.C. 20005
Tel. (202) 371-2600
Fax. (202) 371-2540

jtuminar-PTAB@sternekessler.com
mspecht-PTAB@sternekessler.com
dblock-PTAB@sternekessler.com
spappasPTAB@sternekessler.com
PTAB@sternekessler.com.

Dated: July 5, 2024

/Jonathan A. Roberts/

Jonathan A. Roberts (Reg. No. 68,565)
NIXON & VANDERHYE P.C.
901 N. Glebe Road, 11th Floor
Arlington, VA 22203

*Counsel for Patent Owner
BT Americas Inc.*