

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETFLIX, INC.,

Petitioner

v.

VL COLLECTIVE IP, LLC,

Patent Owner

IPR2023-00891
U.S. Patent 8,605,794

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Patent Owner requests an oral argument for this *inter partes* review. The Board's Scheduling Order sets the oral argument, if requested, for October 10, 2024. (Paper 18 at 12.)

Patent Owner requests an in-person hearing at the USPTO in Alexandria, VA with one hour of oral argument per side. The parties are in agreement that an in-person hearing and one hour of oral argument per side is appropriate for this case. Patent Owner requests the opportunity to address all issues raised in the papers, including:

- How challenged claims 1-5, 9-13, 15-17, 20-21 are patentable under ground 1 presented in the Petition (Paper 2);
- How challenged claims 6-8, 22 are patentable under ground 2 presented in the Petition (Paper 2);
- How challenged claims 14 are patentable under ground 3 presented in the Petition (Paper 2);
- How challenged claims 18 and 19 are patentable under ground 4 presented in the Petition (Paper 2);
- All issues raised in the Board's Institution Decision (Paper 17);
- All arguments raised in Patent Owner's Response (Paper 28), Petitioner's Reply (Paper 40), and Patent Owner's Sur-reply, including the parties' claim construction and prior art arguments;

- All issues raised in any paper of record in this proceeding;
- All issues raised by Petitioner in its request for oral argument; and
- All issues raised by the Board during the oral argument or for which the Board seeks clarification.

If the Board has any questions or comments, counsel for Patent Owner can be available at the Board's convenience.

Dated: August 28, 2024

Respectfully submitted,

/s/ Christine E. Lehman/

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served on August 28, 2024 via electronic mail, as agreed to by counsel, upon the following counsel for Petitioner:

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Dated: August 28, 2024

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