

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.; INSTAGRAM, INC.; WHATSAPP LLC; META
PLATFORMS TECHNOLOGIES, LLC; AND GIPHY, INC.

Petitioners

v.

VL COLLECTIVE IP LLC

Patent Owner

Case IPR2023-00924
U.S. Patent 7,436,980

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Petitioners respectfully request in-person oral argument for IPR2023-00924 (the “Matter”). Petitioners request that oral argument in this Matter occur back-to-back with oral argument in IPR2023-00923 (with a separate transcript issued for each oral argument). The issues to be argued with respect to this Matter include the following:

1. Obviousness of U.S. Patent No. 7,436,980 on the instituted grounds (*see*, Paper 11; Paper 3):

Ground	Challenged Claims	Proposed Statutory Rejection
I	1-16	Obvious under §103 over Zhao
II	1-16	Obvious under §103 over Steffens in view of Zhao
III	1-16	Obvious under §103 over Ozer in view of Zhao
IV	1-16	Obvious under §103 over TLP

2. Procedural and evidentiary issues raised, *e.g.*, in a Motion to Exclude Evidence.
3. Any additional issues on which the Board seeks information or clarification.

Petitioners request, and Patent Owner agrees, that each party be allowed a total of seventy-five (75) minutes for its argument in this Matter. Petitioners may reserve a portion of its time for rebuttal.

The Parties have previously stated their preference for an in-person Oral Argument hearing at the USPTO headquarters in Alexandria, Virginia. Paper 14.

Petitioners further request the use of audio-visual equipment to assist its arguments and to display its demonstrative exhibits. Petitioners request a computer connectable projector, an ELMO, and a screen. If instead the Board decides oral argument will be conducted by remote videoconferencing, Petitioners request permission to use video-conferencing software to allow the presentation of demonstratives.

Dated: July 24, 2024

Respectfully submitted,

/s/ W. Todd Baker

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on July 24, 2024, via electronic mail to counsel of record for the Patent Owner at the following:

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