UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

GEOSCOPE TECHNOLOGIES PTE. LTD,
Patent Owner.

Case IPR2023-01211
U.S. Patent No. 8,786,494

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's February 20, 2024 Scheduling Order (Paper 15), Geoscope Technologies Pte. Ltd. ("Patent Owner") respectfully requests oral argument, scheduled for November 20, 2024. Patent Owner has met and conferred with Petitioner and the parties jointly request oral argument in IPR2023-01209, -01210, -01211 and -01212 be consolidated into a single oral argument with 1.5 hours of argument per side (for 3 hours total). Patent Owner requests that oral argument be held virtually by videoconference.

Reservation Of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund., Ltd. et al. v. VirnetX Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.")

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, anticipation, obviousness, enablement of the prior art, motivation to combine, and reasonable expectation of success;
- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and
- Any other issues that the Board deems necessary for issuing a Final Written Decision, including any questions, rebuttals, or arguments that may arise during the oral argument.

The Board's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 1.5 hours of total argument time per side for a single consolidated hearing for IPR2023-01209, -01210, -01211 and -01212, collectively. Patent Owner believes that this is a sufficient amount of time to discuss all issues in these cases.

Equipment: Patent Owner requests link(s) to a teleconference platform (e.g., Zoom, Teams, etc.) with the ability to display possible demonstratives and exhibits during the remote hearing.

LEAP Practitioner Participation Request: If Patent Owner decides to have a LEAP Practitioner participate in oral argument, Patent Owner will submit any

LEAP Practitioner Request and Certification form to PTABHearings@uspto.gov after the Board issues its Order Setting Oral Argument and at least five business days before the hearing.

Date: October 8, 2024

Respectfully submitted,

/ Stephen McBride /

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

The names and email address of the parties being served are as follows:

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Date: October 8, 2024 By: _/Stephen McBride/_____
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