UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

GEOSCOPE TECHNOLOGIES PTE. LTD,
Patent Owner.

Case IPR2023-01213
U.S. Patent No. 9,097,784

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") requests oral argument in this IPR, scheduled for November 20, 2024. 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 45 minutes of total argument time per side. Patent Owner believes that this is a sufficient amount of time to discuss all issues in this case.

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 /

Stephen McBride
Reg. No. 78,396
CARMICHAEL IP, PLLC
8607 Westwood Center Drive
Suite 270
Tysons, VA 22182
Email: stevemcbride@carmichaelip.com
Telephone: (703) 646-9247

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:

Lead Counsel: Patrick C. Keane, Esq. Reg. No. 32,858 BUCHANAN INGERSOLL & ROONEY PC 1737 King Street, Suite 500 Alexandria, Virginia 22314 Direct Telephone: (703) 838-6522 Email: patrick.keane@bipc.com	**Backup Counsel:** Roger H. Lee, Esq. Reg. No. 46,317 BUCHANAN INGERSOLL & ROONEY PC 1737 King Street, Suite 500 Alexandria, Virginia 22314 Direct Telephone: (703) 838-6545 Email: roger.lee@bipc.com
Backup Counsel: Matthew L. Fedowitz, Esq. Reg. No. 61,386 BUCHANAN INGERSOLL & ROONEY PC 1700 K Street, NW, Suite 300 Washington, DC 20006 Direct Telephone: (202) 452-7306 Email: matthew@fedowitz@bipc.com	**Backup Counsel:** Andrew R. Cheslock, Esq. Reg. No. 68,577 BUCHANAN INGERSOLL & ROONEY PC 1737 King Street, Suite 500 Alexandria, Virginia 22314 Direct Telephone: (703) 838-6523 Email: andrew.cheslock@bipc.com
Backup Counsel: Mythili Markowski, Ph.D., Esq. Reg. No. 67,063 BUCHANAN INGERSOLL & ROONEY PC 1700 K Street, NW, Suite 300 Washington, DC 20006 Direct Telephone: (202) 452-7314	**Backup Counsel:** Samuel Harrod, Esq. Reg. No. 79,148 BUCHANAN INGERSOLL & ROONEY PC Union Trust Building 501 Grant Street, Suite 200 Pittsburgh, Pennsylvania 15219

Email: mythili.markowski@bipc.com	Direct Telephone: (412) 562-8805 Email: samuel.harrod@bipc.com
Backup Counsel: Ralph G. Fischer, Esq. Reg. No. 55,179 BUCHANAN INGERSOLL & ROONEY PC Union Trust Building 501 Grant Street, Suite 200 Pittsburgh, Pennsylvania 15219 Direct Telephone: (412) 392-2121 Email: ralph.fischer@bipc.com	

Date: October 8, 2024 By: _/Stephen McBride/_____
Stephen McBride
Reg. No. 78,391