

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Walt Disney Parks and Resorts U.S., Inc.,

Petitioner,

v.

Agile Journeys LLC,

Patent Owner.

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PTAB Case No. IPR2024-00029

U.S. Patent No. 7,212,983 B2

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Patent Owner hereby respectfully requests oral argument, pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 8). The oral hearing is currently scheduled for January 14, 2025. Paper 8, 11. Patent Owner requests an in-person hearing in Alexandria, VA. Patent Owner requests that each side be allotted forty-five (45) minutes total for oral argument.

The issues to be argued include:

- A. The patentability of the challenged claims of U.S. Patent No. 7,212,983;
- B. Claims 1, 3, 5, 7-8, 10-14, 16-17, 19-20, 22-25 are not obvious over Sim in view of Doi;
- C. Claims 4, 18, 21 are not obvious over Sim (as modified by Doi) in view of Waytena;
- D. Claims 1, 3-5, 8, 10, 12-14, 16-21, 23-25 are not obvious over Waytena;
- E. Claims 1, 3-5, 8, 10, 12-14, 16-21, 23-25 are not obvious over Waytena in view of Herz;
- F. Claim 7 is not obvious over Waytena (as modified by Herz) in view of Sim;
- G. Claims 11, 22 are not obvious over Waytena (as modified by Herz) in view of Doi;
- H. Any other issues that the Petitioner and Patent Owner properly raised in the Petition, Patent Owner Response, Reply, and Sur-reply in this proceeding;
- I. Any procedural or evidentiary issues raised in such briefing; and

J. Any other issues that the Board deems necessary for issuing a final written decision.

Patent Owner requests the ability to use audio/visual equipment to display demonstratives and exhibits at the oral hearing, to the extent available at the time of the hearing.

Date: December 3, 2024

Respectfully submitted,

/s/ Jay P. Kesan

Jay P. Kesan (Reg. No. 37,488)

KEY IP LAW GROUP

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*Counsel for Patent Owner*

*Agile Journeys, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on the date indicated below, a complete and entire copy of this submission was served by email to Petitioner's counsel via the email addresses of record as provided in Petitioner's Service Information in the October 11, 2023 Petition submission.

Respectfully submitted,

Dated: December 3, 2024

By: /s/ Jay P. Kesan  
Jay P. Kesan  
Reg. No. 37,488

Counsel for Patent Owner