UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLR WORLDWIDE SALES LIMITED,
Petitioner

v.

FLIP PHONE GAMES, INC.,
Patent Owner

Case No. IPR2024-00171
Patent No. 10,617,958

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order (Paper 10), Patent Owner Flip Phones Games, Inc. ("Patent Owner"), requests that the Board hear oral argument in this matter. The Scheduling Order set February 6, 2025, as the date for oral argument. Patent Owner requests: (1) that the oral argument be conducted remotely via video, (2) that oral argument be consolidated with argument for Proceeding No. IPR2024-00200 challenging U.S. Patent No. 11,117,056, which is scheduled to occur on the same day, and (3) that it be given (60) sixty minutes to present its arguments for the two consolidated proceedings.

Patent Owner specifies the following issues to be argued:

1. Whether Petitioner has carried its burden of establishing a motivation to modify Hays including based on a combination with Chu;

2. Whether Petitioner has carried its burden of establishing a motivation to modify Levkovitz including based on a combination with Chu;

3. Whether Petitioner has carried its burden of establishing that the cited references disclose each element of Challenged Claims 1–14 and whether a POSITA would be motivated to combine the cited references to meet the claims;

4. The construction of any claim term necessary to determining the patentability of any of Challenged Claims 1–14;

5. Whether Hays is "prior art consisting of patents or printed publications" under § 311(b) and is therefore ineligible to be prior art in an IPR;

6. Whether secondary considerations of non-obviousness confirm the patentability of any challenged claim;

7. The appropriate weight to be afforded to each party's expert witness;

8. All issues raised in Petitioner's request for oral hearing; and

9. Any outstanding motions, pleadings, or other issues that the Board raises or deems necessary for issuing a Final Written Decision.

Dated: December 16, 2024

By: */Michael Morlock/*
Michael Morlock
Reg. No. 62,245
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 has been served electronically via email upon the following:

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