

Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

SECURITY FIRST INNOVATIONS, LLC,
Patent Owner.

Case No. IPR2024-00212
Patent No. 11,178,116

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Petitioner Google LLC, by and through its attorneys, respectfully requests oral argument, currently scheduled for February 20, 2025. Petitioner's preference is for the oral argument to be held virtually via videoconference.¹

Oral argument is currently scheduled for the same day (February 20, 2025) in this proceeding (IPR2024-00212) and in IPR2024-00214 and IPR2024-00215 between the same parties. As to IPR2024-00214 and IPR2024-00215, Petitioner requests that those two proceedings be heard together in a combined hearing, as the patents-at-issue share a specification, some of the prior-art references at issue are the same, and the panel of APJs is the same. As to this proceeding (IPR2024-00212), the challenged patent's specification is different, some of the prior-art references at issue are different, and one APJ on the panel is different. Petitioner defers to the Board's preference as to whether to hear IPR2024-00212 separately or in a combined hearing with IPR2024-00214 and IPR2024-00215.

If one combined hearing is held for all three proceedings, Petitioner requests a total of 120 minutes to present its arguments, and requests the ability to reserve a

¹ In accordance with the Scheduling Order (Paper 12) at 6, the parties met and conferred, but disagree on their preferences. Petitioner prefers a video hearing; Patent Owner stated that it prefers an in-person hearing.

portion of its total time for presenting rebuttal arguments after Patent Owner's presentation. *See* November 2019 Consolidated Trial Practice Guide at 83.

If IPR2024-00212 is heard separately, Petitioner requests a total of 60 minutes to present its arguments in IPR2024-00212.² Petitioner requests the ability to reserve a portion of its total time for presenting rebuttal arguments after Patent Owner's presentation.

Pursuant to 37 C.F.R. § 42.70(a), and without intending to waive any issue not specifically identified, Petitioner requests the ability to present arguments on all instituted grounds of unpatentability, any issues raised in the parties' papers in this trial and the Board's institution decision, and any other issues the Board deems necessary for issuing a final written decision.

² If the -00214 and -00215 proceedings are combined into one hearing that is separate from the -00212 hearing, Petitioner requests a total of 90 minutes to present its arguments in the combined -00214/-00215 hearing, given that some disputed issues overlap between those two proceedings and some do not, and requests the ability to reserve a portion of its total time for presenting rebuttal arguments after Patent Owner's presentation.

Respectfully submitted,
Google LLC

Date: January 9, 2025

/Gregory Nieberg/

Elisabeth H. Hunt, Reg. No. 67,336
Richard F. Giunta, Reg. No. 36,149
Marc S. Johannes, Reg. No. 64,978
Gregory S. Nieberg, Reg. No. 57,063
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
(617) 646-8000 Phone
(617) 646-8646 Fax

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on January 9, 2025, I will cause a copy of the foregoing document, including any exhibits filed therewith, to be served via electronic mail, as previously consented to by Patent Owner, upon the following:

Stephen J. Elliott
Kenneth Weatherwax
Nathan Lowenstein
Colette Woo
Dustin F. Guzior
Andrei Iancu

elliotts@sullcrom.com
Weatherwax@lowensteinweatherwax.com
Lowenstein@lowensteinweatherwax.com
Woo@lowensteinweatherwax.com
guziord@sullcrom.com
iancua@sullcrom.com
SFI_PTAB@sullcrom.com

Date: January 9, 2025

/MacAulay Rush/
MacAulay Rush
Paralegal
WOLF, GREENFIELD & SACKS, P.C.