Paper No. __

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC,
Petitioner,

v.

SECURITY FIRST INNOVATIONS, LLC
Patent Owner.

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Case No. IPR2024-00215
Patent No. 10,452,854

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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 (IPR2024-00215) and in IPR2024-00212 and IPR2024-00214 between the same parties. Petitioner requests that IPR2024-00214 and IPR2024-00215 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 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 17) 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 IPR2024-00214 and IPR2024-00215 are heard in a combined hearing and IPR2024-00212 is heard separately, Petitioner requests in the -00214/-00215 hearing a total of 90 minutes to present its arguments, given that some disputed issues overlap between the two proceedings and some do not.[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.

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[2] For a separate -00212 hearing, Petitioner requests a total of 60 minutes to present its arguments in the -00212 hearing, 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/

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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:

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Date: January 9, 2025

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