IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.

Petitioners,

v.

PROXENSE, LLC

Patent Owner

IPR2024-00232

IPR2024-01333

U.S. Patent No. 8,352,730

PATENT OWNER'S REQUEST FOR ORAL ARGUMENTS

UNDER 37 C.F.R. § 42.70

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner Proxense, LLC ("Patent Owner" or "Proxense") respectfully submits this Request for Oral Arguments on the following:

1. The instituted grounds of unpatentability as detailed in the Institution Decision;
2. The construction of the claims, including but not limited to, the construction of "third-party trusted authority" as informed by the transaction specified in the claims at issue;
3. The implication of co-pending *Ex Parte* Reexamination of U.S. Patent No. 8,352,730 (Control Number 90/015,052) on these proceedings; and
4. Any additional matters raised previously in these proceedings the Board may wish the parties to discuss.

Patent Owner provides the foregoing listing of issues without waiving consideration of any unlisted issue.

Consolidation of Hearings

Patent Owner respectfully requests a consolidated hearing with IPR2024-00233 (joined with IPR2024-01334) of no more than 120 minutes (i.e., 60 minutes per side) in length. Consolidation of the hearings will provide a more efficient use of the Office's time and resources because: 1) the proceedings involve the same parties; 2) the proceedings concern patents within the same family; 3) the same prior art references are asserted in each of the proceedings; and 4) the construction of the same claim terms are at issue.

Apple Inc. is the Petitioner in these proceedings and IPR2024-00233. Accordingly, the proceedings involve the same parties.

Additionally, U.S. Patent 8,886,954 at issue in IPR2024-00233 is a continuation of U.S. Patent No. 8,352,730 at issue in these proceedings. Accordingly, IPR2024-00232 and IPR2024-00233 concern patents within the same family.

Furthermore, the same combinations of U.S. Patent No. 7,188,110 ("Ludtke") and U.S. Patent Application Publication No. 2002/0046336 ("Kon") are asserted in each of IPR2024-00232 and IPR2024-00233. Accordingly, the same prior art references are asserted in each proceeding.

Finally, the construction of "third-party trusted authority" and "access message" is at issue in IPR2024-00232 and IPR2024-00233.

Given the above overlap of issues, identical parties, and the related patents at issue, consolidating oral hearings for IPR2024-00232 and IPR2024-00233 provides the most efficient use of the Office's time and resources.

Video Hearing Requested

Patent Owner respectfully requests that the oral argument be held virtually by videoconference.

Dated: March 11, 2025

Respectfully submitted by,

/s/David L. Hecht

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

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the following document was served on March 11, 2025 by e-mailing copies to the e-mail addresses as provided in Petitioner's Petition.

Dated: March 11, 2025

Respectfully submitted by,

/s/David L. Hecht

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