

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

MOBILE DATA TECHNOLOGIES LLC,
Patent Owner.

Case IPR2024-00248
Patent 9,032,039 B2

PETITIONER'S REQUEST FOR ORAL HEARING

Pursuant to 37 C.F.R. § 42.70(a), Petitioner Meta Platforms, Inc. requests an oral hearing on all grounds of unpatentability raised in this proceeding. Petitioner also requests oral hearing on any issues raised by Patent Owner in its Request for Oral Hearing, any procedural or evidentiary issues raised by the parties, and any additional issues or questions raised by the Board or the parties before or during the oral argument.

Petitioner requests 60 minutes total to address all of the issues involved in this proceeding. Although the oral hearing will address five IPRs, Petitioner believes 60 minutes is sufficient because of near complete overlap in prior art and substantive issues. To the extent the Board schedules the hearing to last more than 120 minutes total or provides further opportunity to address the issues (such as a closing statement), however, Petitioner requests that it should be given an equal opportunity to Patent Owner.

Petitioner further requests that it be permitted to speak first at oral argument as the party bearing the burden of showing the unpatentability of the challenged claims, and that it be permitted to reserve time for rebuttal following Patent Owner's allotted argument time.

Petitioner requests that the oral hearing be held virtually by videoconference. If the Board requires an in-person hearing, Petitioner requests the hearing be held at the USPTO headquarters in Alexandria, Virginia, to the extent practicable

including the capacity of the hearing room. Petitioner believes that there will be no more than four attorneys and clients present for this oral hearing on behalf of Petitioner.

Should arguments take place in person, Petitioner also requests that its attorneys be allowed to use computers at the hearing (in addition to the counsel making the argument using his or her computer to show the demonstratives) to avoid the need for the parties to bring entire paper copies of the record into the hearing room and to facilitate efficient answering of panel questions. Petitioner further requests the case of audio-visual equipment suitable to display papers of record and demonstrative exhibits, including a computer-connectable projector, an ELMO, and a screen.

Petitioner further requests the services of a court reporter to transcribe the proceeding.

Dated: January 28, 2025

Respectfully submitted,

COOLEY LLP
ATTN: Patent Group
1299 Pennsylvania Avenue NW
Suite 700
Washington, DC 20004
Tel: (650) 843-5001
Fax: (650) 849-7400

By: / Heidi L. Keefe /
Heidi L. Keefe
Reg. No. 40,673
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. Section 42.6, that a complete copy of the attached **PETITIONER'S REQUEST FOR ORAL HEARING** related documents, are being served via electronic mail on the 28th day of January 2025, upon Patent Owner by serving the Patent Owner's counsel of record in this proceeding as follows:

Erick S. Robinson
erobinson@brownrudnick.com
Patrick M. Dunn
pdunn@brownrudnick.com
Homayoon Rafatijo
hrafatijo@brownrudnick.com
Jayne C. Piana
jpiana@brownrudnick.com
Jayme Partridge
jpartridge@brownrudnick.com
MDT-Meta-BR@brownrudnick.com
BROWN RUDNICK LLP

DATED: January 28, 2025

/ Heidi L. Keefe /
Heidi L. Keefe
Reg. No. 40,673
COOLEY LLP