UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.,

Petitioner

v.

MOTION OFFENSE, LLC,

Patent Owner

IPR2024-00286

U.S. Patent No. 11,611,520

PATENT OWNER'S REQUEST FOR ORAL HEARING

37 C.F.R. § 42.70

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via PTAB E2E

Pursuant to 37 C.F.R. § 42.70(a), 35 U.S.C. § 316(a)(10), and the Board's July 25, 2024 Scheduling Order (Paper 13), Patent Owner respectfully requests oral argument in this proceeding. Under the Scheduling Order, oral argument is currently scheduled for April 23, 2025.

Request for Oral Argument

Patent Owner requests (without any intent to waive considerations of any issue not requested) a virtual hearing to address the following issues:

- Petitioner's assertion that the challenged claims are unpatentable on the instituted grounds set forth in its Petition.
- Whether Petitioner's Reply contained any new arguments or new evidence beyond the proper scope of a Reply or was accompanied by required routine discovery;
- The appropriate construction of the claims;
- Any motions to exclude filed by Patent Owner or Petitioner;
- Any issues specified by Petitioner in its request for oral argument or raised by Petitioner during oral argument; and
- Any other issues the Board deems necessary for issuing a final written decision.

Pursuant to the USPTO's notice regarding PTAB oral hearings occurring after March 13, 2020, Patent Owner requests to participate via remote video

teleconferencing and/or telephonically, unless the USPTO further notifies otherwise. Patent Owner respectfully requests that it be permitted to introduce demonstrative exhibits via screensharing methods. Patent Owner will also provide Petitioner and the Board with an electronic binder containing the demonstrative exhibits.

Patent Owner requests that the Board grant each side 45 minutes of oral argument. Patent Owner requests the ability to reserve a portion of its total time for presenting rebuttal arguments. Patent Owner also requests that the hearing be consolidated with the hearing in IPR2024-00287 and that the 45 minute allotment per side apply to the consolidated hearing covering both proceedings.

This Request is timely, being filed on March 14, 2025.

Date: March 14, 2025

Respectfully submitted,

/ Derek Dahlgren /
Derek Dahlgren (*pro hac vice*)
Timothy Devlin (Reg. No. 41,706)
1526 Gilpin Avenue
Wilmington, DE 19806
(302)-449-9010
ddahlgren@devlinlawfirm.com
tdevlin@devlinlawfirm.com

Attorney for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on March 14, 2025 the foregoing document is being served via electronic mail upon the following counsel of record for Petitioner:

Trishan Esram (Reg. No. 74,075) Wilmer Cutler Pickering Hale & Dorr LLP 60 State Street Boston, MA 02109 Telephone: (617) 526-6223 trishan.esram@wilmerhale.com	Gregory Lantier (*pro hac vice*) Wilmer Cutler Pickering Hale & Dorr LLP 60 State Street Boston, MA 02109 Telephone: (617) 526-6223 gregory.lantier@wilmerhale.com Liv Herriot (*pro hac vice*) Wilmer Cutler Pickering Hale & Dorr LLP 2600 El Camino Real, Suite 400 Palo Alto, CA 94306 Tel.: 650-858-6000 Liv.Herriot@wilmerhale.com

/ Derek Dahlgren /
Derek Dahlgren