

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DROPBOX, INC.
Petitioner

v.

MOTION OFFENSE, LLC
Patent Owner

IPR2024-00287
U.S. Patent No. 11,611,520

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's July 25, 2024 Scheduling Order (Paper No. 12), Petitioner respectfully requests oral argument, as currently scheduled on April 23, 2025. Petitioner respectfully requests that the oral argument be conducted in-person at the Denver, Colorado, USPTO Rocky Mountain Regional Office, and that each side be allotted sixty (60) minutes in total to present arguments for the two proceedings to be heard on April 23, 2025 (IPR2024-00286 and IPR2024-00287). Petitioner further requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits. Petitioner and Patent Owner met and conferred but did not come to an agreement on the format and duration of the oral argument.

Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- Issues related to the Board's Decision on Institution (Paper No. 12) and the grounds instituted in the Decision;
- Issues related to Patent Owner's proposed claim construction;
- Whether claims 9, 10, 14, and 15 are unpatentable under 35 U.S.C. § 103 as being obvious over Riepling;
- Whether claims 11–13, 16, and 22–24 are unpatentable under 35 U.S.C. § 103 as being obvious over Riepling and Manzano;

- Whether claims 9, 10, 14, and 15 are unpatentable under 35 U.S.C. § 103 as being obvious over Riepling and Meisels;
- Whether claims 11–13, 16, and 22–24 are unpatentable under 35 U.S.C. § 103 as being obvious over Riepling, Manzano, and Meisels;
- Whether claims 11–13, 16, and 22–24 are unpatentable under 35 U.S.C. § 103 as being obvious over Riepling, Manzano, and Garcia;
- Whether claims 11–13, 16, and 22–24 are unpatentable under 35 U.S.C. § 103 as being obvious over Riepling, Manzano, Meisels, and Garcia;
- Reply to any arguments raised in the Patent Owner Response (Paper No. 20) or additional briefing yet to be filed (*e.g.*, Patent Owner's Sur-Reply);
- Respond to any issues specified by Patent Owner in its request for oral argument;
- Any arguments or additional issues raised by either party in a request for oral argument, motion to strike (if any), motion to exclude (if any), or any other motion, paper, opposition, response, reply, or sur-reply filed by either party before oral argument; and
- Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Respectfully Submitted,

Date: March 14, 2025

/Trishan Eram/

Trishan Eram
Registration No. 74,075
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that, on March 14, 2025, I caused a true and correct copy of the foregoing materials:

- Petitioner's Request for Oral Argument

to be served via electronic mail by consent on counsel of record at:

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Respectfully Submitted

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