

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

THL HOLDING COMPANY, LLC,

Patent Owner

Case No. IPR2024-00398

U.S. Patent No. 11,265,680

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board’s July 25, 2024, Scheduling Order (Paper 7), Petitioner respectfully requests oral argument for the trial currently scheduled on April 29, 2025. Petitioner requests oral argument for this IPR (IPR2024-00398) be back-to-back with oral argument for IPR2024-00399 (for which a Request for Oral Argument is being concurrently filed). The Parties conferred and agree to a requested forty-five (45) minutes of argument for each Party for this IPR2024-00398 and an in-person hearing at the Office’s Denver, Colorado location.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

1. Whether Claims 1, 4, and 7-8 are obvious under § 103 over U.S. Patent Publication No. 2007/0197220A1 to Kalliola, et al. (“*Kalliola*”) in view of U.S. Patent Publication No. 2008/0320587A1 to Vauclair, et al. (“*Vauclair*”);
2. Whether Claims 2-3, 6, 10-11, 15-17, and 20 are obvious under § 103 over *Kalliola* in view of *Vauclair*, and U.S. Patent Publication No. 2008/0125040 A1 to Kalayjian (“*Kalayjian*”);
3. Whether Claim 5 is obvious under § 103 over *Kalliola* in view of *Vauclair* and U.S. Patent No. 6,487,595 to Turunen, et al. (“*Turunen*”);
4. Whether Claims 18-19 are obvious under § 103 over *Kalliola* in view of *Vauclair*, *Kalayjian*, and *Turunen*;

5. Whether Claim 9 is obvious under § 103 over *Kalliola* in view of *Vauclair*, and U.S. Patent Publication No. 2004/0252030 to Trimble, et al. (“*Trimble*”);
6. Whether Claim 12 is obvious under § 103 over *Kalliola* in view of *Vauclair*, *Kalayjian*, and *Trimble*;
7. Any claim constructions, unpatentability grounds, or other issues raised in the Petition or Petitioner Reply, the Patent Owner Preliminary Response, Patent Owner’s Request for Rehearing, Patent Owner Response, Patent Owner Sur-Reply, the Board’s Decision Denying Patent Owner’s Request for Rehearing, or the Board’s Institution Decision;
8. Any issues regarding motions to exclude or motions to strike that may be filed or pending; and
9. Any issues otherwise raised by the Board.

Respectfully submitted,

ERISE IP, P.A.

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COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.6

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on March 13, 2025, the foregoing *Petitioner's Request for Oral Argument* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

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