

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,
Petitioner,

v.

ALMONDNET, INC.,
Patent Owner.

Case IPR2024-00419
Patent 11,564,015

PETITIONER'S REQUEST FOR ORAL ARGUMENT

FreeWheel Media, Inc. (“Petitioner”) hereby requests oral argument under 37 C.F.R. § 42.70 and the Board’s September 4, 2024 Scheduling Order (Paper 10). Oral argument is currently scheduled for May 29, 2025. (Paper 10, Due Date 8).

Petitioner requests argument on all grounds accepted for trial in the Institution Decision and any questions that the Board may have, including:

A. Whether claims 1-7, 9-10, 12-20, 22-23, and 25-26 are unpatentable under 35 U.S.C. § 103 over Baig-Banga507-Banga690-McFarland;

B. Whether claims 8 and 21 are unpatentable under 35 U.S.C. § 103 over Baig-Banga507-Banga690-McFarland-Costa;

C. Whether claims 11 and 24 are unpatentable under 35 U.S.C. § 103 over Baig-Banga507-Banga690-McFarland-Ashbaugh;

D. Whether claims 1-7, 9-10, 13-20, 22-23, and 26 are unpatentable under 35 U.S.C. § 103 over Baig-Zwicky-Damick;

E. Whether claims 1-7, 9-10, 13-20, 22-23, and 26 are unpatentable under 35 U.S.C. § 103 over Baig-Satapati-Damick;

F. Whether claims 8 and 21 are unpatentable under 35 U.S.C. § 103 over Baig-Zwicky-Damick-Costa;

G. Whether claims 8 and 21 are unpatentable under 35 U.S.C. § 103 over Baig-Satapati-Damick-Costa;

H. Whether claims 11 and 24 are unpatentable under 35 U.S.C. § 103 over Baig-Zwicky-Damick-Ashbaugh;

I. Whether claims 11 and 24 are unpatentable under 35 U.S.C. § 103 over Baig-Satapati-Damick-Ashbaugh;

J. Whether claims 12 and 25 are unpatentable under 35 U.S.C. § 103 over Baig-Zwicky-Damick-Banga507; and

K. Whether claims 12 and 25 are unpatentable under 35 U.S.C. § 103 over Baig-Satapati-Damick-Banga507.

Furthermore, Petitioner requests argument on any additional issues that Patent Owner may seek to raise on oral argument including rebuttal to any material in Patent Owner's presentation, any additional issues raised in papers filed in this proceeding to include Patent Owner's Response or Sur-Reply, any additional issues raised in papers which are yet to be filed such as Motions to Exclude and Oppositions to Motions to Exclude, and any other filings, motions, pleadings, or issues deemed necessary by the Board for issuing a Final Written Decision.

Given the number of combinations of prior art and number of challenged claims, Petitioner suggests that an allocation of one hour of time per side would be appropriate for the oral argument.

Finally, Petitioner's counsel contacted Patent Owner's counsel concerning whether the hearing should be conducted in-person or via video conference.

Petitioner's counsel did not receive a response from Patent Owner's counsel.

Petitioner prefers that the hearing be conducted in-person.

Dated: April 23, 2025

By: /Frederic M. Meeker/

Frederic M. Meeker
Reg. No. 35,282
Banner & Witcoff, Ltd.
1100 13th Street, NW
Suite 1200
Washington, DC 20005
(202) 824-3000
fmeeker@bannerwitcoff.com

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.105, I hereby certify that I caused a true and correct copy of this **PETITIONER'S REQUEST FOR ORAL ARGUMENT** in connection with IPR2024-00419 to be served via e-mail on April 23, 2025, in its entirety on the following counsel of record for Patent Owner:

RMIRZAIE@RAKLAW.COM
RAK_ALMONDNET@RAKLAW.COM
JLINK@RAKLAW.COM
JMILKEY@RAKLAW.COM
PWANG@RAKLAW.COM
BWANG@RAKLAW.COM

Dated: April 23, 2025

By: /Carlos Goldie/

Carlos Goldie