

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,

Petitioner,

v.

INTENT IQ, LLC,
Patent Owner.

IPR2024-00421
Patent 7,861,260 B2

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 October 2, 2024 Scheduling Order (Paper 10). Oral argument is currently scheduled for June 18, 2025. (Paper 21, 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 1-5, 7, 12, 15, 17, 22, 26-28, 37-38, 44, 54, 56-58, 61-62, 71-75, 77-80, 83-84, 86, 91, 94, 96, 101, 106, 116, 118-119, 125, 128, 137-141, 143-144, 148, and 151-152 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, and Zwicky;

B. Whether claims 1-5, 7, 12, 15, 17-18, 22, 26-28, 35-38, 44, 54, 56-58, 61-62, 71-75, 77-80, 83-84, 86, 91, 94, 96-97, 101, 106, 116, 118-119, 125, 128, 137-141, 143-144, 148, and 151-152 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, and Banga690;

C. Whether claims 11 and 90 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Zwicky, and Cox;

D. Whether claims 11 and 90 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Cox;

E. Whether claims 13-14, 16, 92-93, and 95 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Zwicky, Cox, and Han;

F. Whether claims 13-14, 16, 92-93, and 95 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Cox, Han, and Banga690;

G. Whether claims 17, 19-20, 96, and 98-99 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Zwicky, and Leigh;

H. Whether claims 17, 19-20, 96, and 98-99 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Leigh;

I. Whether claims 54, 75, 116, and 141 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Zwicky, and Wing;

J. Whether claims 54, 75, 116, and 141 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Wing; and

K. Whether claims 41, 105, and 127 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Jaye.

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. Patent Owner's counsel indicated they intend to request a remote hearing. Petitioner prefers that the hearing be conducted in-person at the Dallas, Texas, USPTO Regional Office.

Dated: May 22, 2025

By: /Frederic M. Meeker/

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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 IPR2024-00421 to be served via e-mail on May 22, 2025, in its entirety on the following counsel of record for Patent Owner:

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Dated: May 22, 2025

By: /Carlos Goldie/

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