

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREEWHEEL MEDIA, INC.,

Petitioner,

v.

INTENT IQ, LLC,
Patent Owner.

IPR2024-00422
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 11). Oral argument is currently scheduled for June 18, 2025. (Paper 22, 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, 8-9, 21, 24, 26, 31-32, 34, 38-39, 42, 53, 55, 61, 69, 76, 87-88, 100, 103, 117, 121-122, 135, 142, and 145-147 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, and Zwicky;

B. Whether claims 1, 8-9, 21, 24, 26, 31-32, 34, 38-40, 42, 45-48, 52-53, 55, 61, 63-65, 68-69, 76, 87-88, 100, 103, 107-110, 114-115, 117, 121-122, 129-131, 134-135, 142, and 145-147 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, and Banga⁶⁹⁰;

C-K. *Reserved.*

L. Whether claims 6, 8-10, 21, 23, 32, 51, 55, 59-60, 67, 76, 81-82, 85, 87-89, 100, 102, 113, 117, 120, 123-124, 126, 133, 142, 145, and 149-150 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Zwicky, and Howcroft;

M. Whether claims 6, 8-10, 21, 23, 32, 51, 55, 59-60, 67, 76, 81-82, 85, 87-89, 100, 102, 113, 117, 120, 123-124, 126, 133, 142, 145, and 149-150 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga⁶⁹⁰, and Howcroft;

N. Whether claims 49-50, 66, 70, 111-112, 132, and 136 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Smith;

O. Whether claim 33 is unpatentable under 35 U.S.C. § 103 over Baig, Costa, Zwicky, and Middeljans;

P. Whether claims 25, 29, 33, and 104 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Middeljans;

Q. Whether claims 30 and 43 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, Middeljans, and Koningstein; and

R. Whether claims 50, 70, 112, and 136 are unpatentable under 35 U.S.C. § 103 over Baig, Costa, Banga690, and Banga633.

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 IPR2024-00422 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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