

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

PORTSMOUTH NETWORK CORP.,
Patent Owner.

IPR2024-00503
Patent No. 7,035,279

PETITIONER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Petitioner hereby requests an oral argument in the present *inter partes* review. Per the Board's Scheduling Order, the oral argument is scheduled for May 5, 2025 at a time to be announced. Scheduling Order, Paper 8, page 9.

Petitioner requests an in-person hearing in either of the offices offered in the Scheduling Order (Alexandra, VA or San Jose, CA). Petitioner is also open to the panel conducting a virtual hearing via videoconference as requested by Patent Owner.

Petitioner requests 45 minutes of oral argument per side and the opportunity to address all issues timely raised in the papers, including:

- the Parties' mutual position that the terms "*predetermined*" and "*quantum*" do not require formal construction in this proceeding;
- that combining features of Kovvali and Kalman would have been obvious for the reasons provided in the Petition, including the reasons that Patent Owner did not dispute in its Response;
- that a packet-to-be-transmitted is an implicit "*request... to use... resources so as to carry the data flow;*"
- that Claims 1-5 and 9-18 would have been obvious under 35 U.S.C.

§ 103(a) over Kovvali in view of Kalman;

- that Claim 6 would have been obvious under 35 U.S.C. § 103(a) over Kovvali in view of Kalman and Masters;
- that Claims 7 and 8 would have been obvious under 35 U.S.C. § 103(a) over Kovvali in view of Kalman and RFC2892;
- any other issues timely raised in any paper filed by the parties.

If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference.

Respectfully submitted,

Dated: March 25, 2025
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/Theodore M. Foster/
Theodore M. Foster
Lead Counsel for Petitioner
Registration No. 57,456

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing was served on the Patent Owner as detailed below:

Date of service March 25, 2025

Manner of service Electronic Email: jnuttall@steptoe.com

Documents served **Petitioner's Request for Oral Argument**

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