

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION

Petitioners,

v.

PROXENSE, LLC

Patent Owner

IPR2024-00573

U.S. Patent No. 8,646,042 B1

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

UNDER 37 C.F.R. § 42.70

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner Proxense, LLC (“Patent Owner” or “Proxense”) respectfully submits this Request for Oral Argument on the following:

1. The instituted grounds of unpatentability as detailed in the Institution Decision;
2. The construction of the claims, including but not limited to:
 - a. The invocation of 35 U.S.C. § 112(f) for reciting functions performed by general-purpose computers;
 - b. Construction of the term “receive decoder circuit (RDC);”
 - c. Construction of the term “personal digital key (PDC);” and
 - d. Construction of the term “enablement signal;” and
3. Any additional matters raised previously in these proceedings the Board may wish the parties to discuss.

Patent Owner provides the foregoing listing of issues without waiving consideration of any unlisted issue.

Duration of Hearing

Patent Owner respectfully requests a hearing of no more than 120 minutes (i.e., 60 minutes per side) in length.

Video Hearing Requested

Patent Owner respectfully requests that the oral argument be held virtually by videoconference.

Dated: April 1, 2025

Respectfully submitted by,

/s/David L. Hecht

David L. Hecht (Lead Counsel)

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6(e)

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the Patent Owner Request for Oral Argument was served on April 1, 2025, by e-mailing copies to the e-mail addresses provided by Petitioners in their Petition.

Dated: April 1, 2025

Respectfully submitted by,

/s/David L. Hecht

David L. Hecht (Lead Counsel)

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