Filed May 2, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TELADOC HEALTH, INC.,
Petitioner

v.

DATA HEALTH PARTNERS, INC.,
Patent Owner

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IPR2024-00616
Patent 11,144,554 B2

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**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Petitioner Teladoc Health, Inc. respectfully requests oral argument in this proceeding in accordance with 37 C.F.R. § 42.70(a) and pursuant to the Scheduling Order (Paper 10).

Petitioner further respectfully requests an in-person hearing at the USPTO headquarters in Alexandria, Virginia. Petitioner's counsel conferred with Patent Owner's counsel and Petitioner is opposed to Patent Owner's request for a virtual hearing instead of an in-person hearing. Although not discussed during the conference, Petitioner is also opposed to Patent Owner's request to move any in-person hearing to the USPTO office in Dallas, Texas.

Petitioner agrees with Patent owner's proposal of sixty (60) minutes per side for oral argument. Should the Board consolidate the oral argument in this proceeding with the oral argument in IPR2024-0617, Petitioner respectfully requests a minimum of ninety (90) minutes per side for oral argument.

Without waiving consideration of other issues or limiting its ability to address those raised by Patent Owner at oral argument, Petitioner specifies the following issues to be argued:

1. The grounds of unpatentability instituted by the Board, including the obviousness of the claims over Douglas and the combinations of Douglas with Wager, Chitiveli, Klotsche, and Koh.

2. Any issues specified in the Petition, Patent Owner's Response, Petitioner's Reply, and Patent Owner's Sur-Reply.

3. Any issues otherwise raised by the Board.

Dated: May 2, 2025

Respectfully submitted,

*/s/ Michael Solomita*
Michael Solomita (Reg. No. 53,940)

## CERTIFICATE OF SERVICE

The undersigned certifies that on this 2nd day of May, 2025, the foregoing document is being served by e-mail on counsel of record for Patent Owner as follows:

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