UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNDER ARMOUR, INC.,
Petitioner,

v.

ATHALONZ, LLC,
Patent Owner.

Case IPR2024-00638
Patent No. 11,064,760

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Patent Owner Athalonz LLC requests an oral argument for this *inter partes* review. The Board's Scheduling Order sets the oral argument, if requested, for June 17, 2025. Paper 9 at 12.

Format: Patent Owner requests a video hearing for the oral argument. Patent Owner conferred with Petitioner and understands that Petitioner will request an in-person hearing. Patent Owner is requesting a video hearing due to its limited resources as a small operating company and the significant time and expense associated with travel for an in-person hearing.

Time Requested: The five patents challenged by Petitioner in IPR2024-00636, IPR2024-00637, IPR2024-00638, IPR2024-00639, and IPR2024-00640 are related and share a specification. Petitioner's prior art and arguments generally overlap between two groups of patents. IPR2024-00636, IPR2024-00637, and IPR2024-00638 ("the Slope Patents") involve the same primary references and similar issues. IPR2024-00639 and IPR2024-00640 ("the Density Patents") also generally involve the same primary references and similar issues. Given the overlap, Patent Owner requests that the parties be given 75 minutes per side to argue the issues in the three proceedings on the Slope Patents and 90 minutes per side to argue the issues in the two proceedings on the Density Patents. Patent Owner conferred with Petitioner and the parties agree on this time allocation and grouping.

Patent Owner would welcome any guidance from the Board on particular issues across any of the proceedings that the Board is most interested in or the Board's preference for the amount of time necessary for oral argument on any of the proceedings.

Issues to be Argued: Patent Owner requests oral argument on all issues raised in the papers previously filed and those filed between now and the oral argument, including at least the following:

- How the challenged claims are patentable under all grounds raised in the Petition and Reply;
- All issues raised in the Board's Institution Decision (Paper 8);
- All arguments raised in Patent Owner's Response (Paper 12); Petitioner's Reply (Paper 15); and Patent Owner's Sur-Reply (to be filed on May 21, 2025);
- All issues raised by Petitioner in its request for oral argument;
- All issues raised in any forthcoming motions to exclude that are not resolved by the Board prior to the oral argument;
- All issues raised in any paper of record in this proceeding;
- All issues raised by the Board during the oral argument or for which the Board seeks clarification.

If the Board has any questions or comments, Patent Owner's counsel can be available at the Board's convenience.

Dated: May 7, 2025

Respectfully submitted,

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on May 7, 2025 a copy of the foregoing document was served by email upon the following:

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