

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

AYLO FREESITES LTD.,

Petitioner

v.

WELLCOMEMAT, LLC,

Patent Owner

Case No. IPR2024-00710

U.S. Patent No. 8,307,286

PATENT OWNER'S UPDATED REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's September 5, 2024, Scheduling Order (Paper 14), WellcomeMat, LLC ("Patent Owner") respectfully requests oral argument, currently scheduled for June 5, 2025. Patent Owner requests a remote hearing, although Patent Owner can conduct an in-person hearing if that is more convenient for the Board.

Reservation Of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund., Ltd. et al. v. VirnetX Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.")

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, anticipation, obviousness, motivation to combine, and reasonable expectation of success;
- The timeliness of the arguments raised in the proceedings;

- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and
- Any other issues that the Board deems necessary for issuing a Final Written Decision, including any questions, rebuttals, or arguments that may arise during the oral argument.

The Board's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 60 minutes of total argument time per side. Patent Owner believes that this is a sufficient amount of time to discuss all issues in this case.

Equipment: Patent Owner requests teleconference software (e.g., Zoom, Teams, etc.) with the ability to display possible demonstratives and exhibits during the remote hearing.

If the oral argument is conducted in-person, Patent Owner requests permission to use audio and visual equipment to display demonstratives and exhibits.

Dated: April 30, 2025

Respectfully submitted,

/Stephen T. Schreiner/

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2025, I caused a true and correct copy of the foregoing Patent Owner's Updated Request for Oral Argument to be served on the following counsel for Petitioner by electronic mail to the following email addresses:

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