UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIKTOK INC.
Petitioner,

v.

CELLSPIN SOFT, INC.,
Patent Owner

IPR2024-00759
Patent 8,862,757

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Petitioner TikTok Inc. submits this Request for Oral Argument on all of the instituted grounds of unpatentability of claims 1-26 of U.S. Patent No. 8,862,757.

The Board scheduled Oral Hearing for June 18, 2025 in this proceeding (IPR2024-00759), the same day as two related IPR proceedings involving the same parties (IPR2024-00757 and IPR2024-00760). *See* Paper 9 at 14. Petitioner requests that the argument for this proceeding be consolidated with the arguments for IPR2024-00757 and IPR2024-00760 in a single hearing. Petitioner further requests that a consolidated hearing for IPR2024-00767, IPR2024-00768, IPR2024-00769, and IPR2024-00770 proceed immediately or shortly before or after as a separate hearing.

The three proceedings with which Petitioner proposes a consolidated hearing (i.e., IPR2024-00757, IPR2024-00759, and IPR2024-00760) involve related patents and have overlapping claim limitations, prior art grounds, and exhibits. A consolidated hearing would minimize repetitive argument and lead to an efficient presentation of the evidence. As for the other four proceedings (IPR2024-00767, IPR2024-00768, IPR2024-00769, and IPR2024-00770), the claim limitations and prior art are different, and addressing those proceedings in a separate consolidated hearing will avoid confusion of the issues.

Petitioner is amenable to the hearing being conducted virtually by video conference, or in person at the USPTO headquarters in Alexandria, VA or a USPTO Regional Office convenient for the Panel. Petitioner requests at least one hour per side of argument time for the consolidated hearing. During the hearing, Petitioner requests (without waiving consideration of any issue not listed below) to address at least the following issues:

1) Any issue raised during these proceedings by the Board, Patent Owner, or Petitioner;
2) Rebuttal to Patent Owner's remarks on record or during the oral hearing; and
3) Any additional clarification the Board may seek.

Respectfully submitted,

Date: May 9, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on May 9, 2025, a complete and entire copy of this Petitioner's Request for Oral Argument was provided by email to Patent Owner by serving the email correspondence addresses of record as follows:

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