

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.

Petitioner

v.

PROXENSE, LLC

Patent Owner

IPR2024-00782

IPR2024-01399

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

PATENT OWNER'S REQUEST FOR ORAL ARGUMENTS

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 Arguments 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, the applicability of 35 U.S.C. § 112, ¶ 6;
3. The implication of any intervening decisions that may be issued in IPR2024-00405, IPR2024-00407, and IPR2024-00573; and
4. 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.

Consolidation of Hearings

Patent Owner respectfully requests a consolidated hearing with IPR2024-00783 (joined with IPR2025-00075) of no more than 120 minutes (i.e., 60 minutes per side) in length. Consolidation of the hearings will provide a more efficient use of the Office’s time and resources because: 1) proceedings involve the same parties; 2) the proceedings concern patents within the same family; 3) the same prior art

references are asserted in each of the proceedings; and 4) the construction of the same or similar claim terms is at issue.

Video Hearing Requested

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

Dated: July 7, 2025

Respectfully submitted by,

/James A. Zak, Esq./

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Counsel for Patent Owner

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 Patent Owner's Request for Oral Arguments was served on July 7, 2025, by e-mailing copies to the e-mail addresses provided by Petitioner in the Petition.

Dated: July 7, 2025

Respectfully submitted by,

/James A. Zak, Esq./

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