UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

THETA IP, LLC,
Patent Owner

IPR2024-00817
U.S. Patent No. 10,129,825

THETA IP, LLC'S REQUEST FOR ORAL ARGUMENT

Patent Owner Theta IP, LLC ("Theta") respectfully requests oral argument in case IPR2024-00817, in which oral argument is currently scheduled for August 27, 2025 pursuant to the November 26, 2024 consolidated scheduling order.

Theta plans to present oral argument on the following issues:

1. Claims 1-8 would not have been obvious over *Behbahani* (Ex. 1004) in view of *Leete* (Ex. 1005), and *Tan* (Ex. 1006); and

2. Any motion to strike or exclude evidence filed by either party.

Theta also anticipates that it will present oral argument to rebut Petitioner Apple's arguments; to address claim construction or other issues raised in briefing or in the Board's Institution Decision; or other issues raised by the Board.

Counsel for Petitioner and Patent Owner conferred and both parties request ninety (90) minutes[1] of oral argument per side to present arguments at an in-person consolidated hearing at the USPTO Regional Office in Denver, Colorado regarding this proceeding and co-pending proceedings -00816, -00818, -00819, and -00820. The parties are amenable to another in-person location convenient to the Board.

Theta respectfully requests the use of audiovisual equipment to display demonstratives, exhibits, and papers, including the use of a computer, ELMO document presenter, projector, and screen.

[1] Argument regarding any motion to strike or exclude evidence should not be included in this requested time allocation.

Dated: July 15, 2025

/ Aaron R. Hand /
Aaron R. Hand
Reg. No. 80,694
Corey Johanningmeier, Back-Up Counsel
(*pro hac vice*)
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
Telephone: 650-351-7248
Facsimile: 415-426-4744
ahand@bdiplaw.com
cjohanningmeier@bdiplaw.com

Counsel for Patent Owner

CERTIFICATE OF SERVICE

Petitioner has consented to e-mail service in this proceeding. Pursuant to 37 C.F.R. §42.6, the undersigned certifies that on July 15, 2025 a copy of the foregoing document was served by email upon the following counsel at the below email addresses:

Paul R. Hart, (Reg. No. 59,646)
Paul.Hart@eriseip.com
ERISE IP, P.A.
717 17th St., Suite 1400
Denver, Colorado 80202
Telephone: (913) 777-5600
Fax: (913) 777-5601

Adam P. Seitz (Reg. No. 52,206)
Adam.Seitz@eriseip.com
ERISE IP, P.A.
7015 College Blvd., Suite 700
Overland Park, Kansas 66211
Telephone: (913) 777-5600
Fax: (913) 777-5601

Dated: July 15, 2025

/ Aaron R. Hand /

Aaron R. Hand
Reg. No. 80,694
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
Telephone: 650-351-7248
Facsimile: 415-426-4744
ahand@bdiplaw.com

Lead Counsel for Patent Owner