UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

THETA IP, LLC.,
Patent Owner

Case No. IPR2024-00819
Patent No. 11,564,164

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's November 26, 2024, Scheduling Order (Paper 12), Petitioner respectfully requests oral argument for the trial currently scheduled on August 27, 2025. Petitioner requests oral argument for this IPR (IPR2024-00819) be consolidated with oral argument for IPR2024-00816, IPR2024-00817, IPR2024-00818, and IPR2024-00820 (for which Requests for Oral Argument are being concurrently filed). Petitioner and Patent Owner have conferred, and both parties request ninety (90) minutes of argument per side for the consolidated hearing and an in-person hearing at the USPTO's Denver, CO Regional Office. The parties are also amenable to an in-person hearing at the Office's Headquarters in Alexandria, VA or its Detroit, MI Regional Office.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

1. Whether Claims 1-20 are obvious under § 103 over "Adaptive Analog IF Signal Processor for a Wide-Band CMOS Wireless Receiver" by Behbahani et al. ("Behbahani") in view of "A 2.4-GHz Low-IF Receiver for Wideband WLAN in 0.6μm CMOS – Architecture and Front-End" by Leete et al. ("Leete") and in further view of "A Broad-Band Tunable CMOS Channel-Select Filter for a Low-IF Wireless Receiver" by Tan et al. ("Tan");

2. Any claim constructions, unpatentability grounds, or other issues raised in the Petition, Petitioner's Reply to Patent Owner's Preliminary Response, or Petitioner's Reply, the Patent Owner Preliminary Response, Patent Owner's Sur-Reply to Petitioner's Reply to Patent Owner's Preliminary Response, Patent Owner Response, Patent Owner Sur-Reply, or the Board's Institution Decision;

3. Any issues regarding motions to exclude or motions to strike that may be filed or pending; and

4. Any issues otherwise raised by the Board.

Respectfully submitted,

ERISE IP, P.A.

BY: */s/ Paul Hart*
Paul R. Hart, Reg. No. 59,646
Adam P. Seitz, Reg. No. 52,206
Erise IP, P.A.

COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.6

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on July 15, 2025, the foregoing *Petitioner's Request for Oral Argument* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

Aaron R. Hand (ahand@bdiplaw.com)
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Respectfully submitted,

By: *__/s/ Paul R. Hart_____*
Paul R. Hart, Reg. No. 59,646

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