

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADOBE INC.,
Petitioner

v.

JONATHAN E. JAFFE,
Patent Owner

Inter Partes Review No. IPR2024-01352
U.S. Patent No. 6,757,828

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

REQUEST FOR ORAL ARGUMENT

Patent Owner hereby requests an oral hearing pursuant to 37 C.F.R. § 42.70. The Board has scheduled the oral hearing for December 9, 2025. Pursuant to the Board's July 23, 2025 Notice of Return to In-person PTAB Hearings, Patent Owner requests the ability to attend the hearing virtually by remote video conference. Patent Owner asserts that good cause exists because lead counsel for Patent Owner has a permanent disability that prevents in-person attendance at the hearing by lead counsel. In the event that the Board does not grant Patent Owner's request to attend the hearing virtually, Patent Owner requests the oral argument be held at the USPTO Southwest Regional Office at 207 S. Houston Street, Suite 159, Dallas, Texas in order to accommodate attendance by alternate counsel for Patent Owner.

Patent Owner requests the ability to use audio visual equipment to display demonstrative exhibits, including the use and display of a PowerPoint presentation. Patent Owner further requests that each party be given sixty (60) minutes of time for its respective presentation, inclusive of any time reserved for rebuttal. In the event that the Board allocates more or less than sixty (60) minutes per side, Patent Owner requests half of the allocated time for its respective presentation.

ISSUES TO BE ARGUED:

- 1) The appropriate construction of “a sensor, which is tightly coupled to said memory” as recited in claim 1 of U.S. Patent No. 9,757,828 (“the ’828 Patent”);
- 2) The appropriate construction of “monitoring the integrity of the tight coupling between said memory and said sensor” as recited in claim 1 the ’828 Patent;
- 3) The appropriate construction of “based on” as recited in claim 1 the ’828 Patent;
- 4) Whether Petitioner has failed to meet its burden of proving that Glass renders obvious claims 1-6 of the ’828 Patent;
- 5) Whether Petitioner has failed to meet its burden of proving that Rieger renders obvious claims 1-6 of the ’828 Patent;
- 6) Whether Petitioner has failed to meet its burden of proving that the combination of Glass and Exif 2.0 or Exif 2.1 renders obvious claims 1-6 of the ’828 Patent;
- 7) Whether Petitioner has failed to meet its burden of proving that the combination of Rieger and Exif 2.0 or Exif 2.1 renders obvious claims 1-6 of the ’828 Patent;

- 8) Whether Petitioner has failed to meet its burden of proving that the combination of Glass and Serret-Avila renders obvious claims 1-6 of the '828 Patent;
- 9) Whether Petitioner has failed to meet its burden of proving that the combination of Rieger and Serret-Avila renders obvious claims 1-6 of the '828 Patent;
- 10) Whether Petitioner has failed to meet its burden of proving that the combination of Glass and Exif 2.0 or Exif 2.1 and Serret-Avila renders obvious claims 1-6 of the '828 Patent;
- 11) Whether Petitioner has failed to meet its burden of proving that the combination of Rieger and Exif 2.0 or Exif 2.1 and Serret-Avila renders obvious claims 1-6 of the '828 Patent;
- 12) Whether Petitioner has failed to meet its burden of proving that challenged claims 1-6 of the '828 Patent are unpatentable;
- 13) Any issues addressed in Patent Owner's papers, including but not limited to, the Patent Owner's Response and Patent Owner's Sur-Reply;
- 14) Any motions to exclude or any other motions that remain pending at the time of the hearing;
- 15) Any issues specified by Petitioner in its Request for Oral Argument;

- 16) Rebuttal to all issues and/or arguments raised by Petitioner; and
- 17) Any responses to issues raised by the Board at or before the hearing.

Dated: October 24, 2025

Respectfully submitted,

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Counsel for Patent Owner

Certificate of Service 37 C.F.R. § 42.6(e)

The undersigned certifies that on October 24, 2025, I will cause true and correct copies of the foregoing Patent Owner's Request for Oral Argument to be served electronically upon the following attorneys who have consented to service via email. Pet. at 2-3.

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