

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC. and AMAZON WEB SERVICES, INC.,¹
Petitioner,

v.

ZIKLAG IP LLC,
Patent Owner.

Case IPR2025-00700
Patent No. 6,182,128

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ Amazon Web Services, Inc. filed a petition and a motion for joinder in IPR2026-00047 and has been joined as a petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.70 and the Board's September 18, 2025, Scheduling Order (Paper 9), Ziklag IP LLC ("Patent Owner") respectfully requests oral argument, currently scheduled for June 17, 2026 (Due Date 8). Patent Owner prefers that the oral argument be held in person at the USPTO headquarters in Alexandria.

Reservation Of Time: Patent Owner requests an opportunity to reserve surrebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund., Ltd. et al. v. VirnetX Inc.*, IPR2015-01046/01047, Paper 60, 2 (PTAB June 2, 2016) ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.")

Issues For Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, obviousness, motivation to combine, and reasonable expectation of success;
- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; and
- Any other issues that the Board deems necessary for issuing a Final Written Decision, including any questions, rebuttals, or arguments that may arise during the oral argument.

The Board's advance guidance is respectfully solicited as to any questions the Board

specifically wishes to be addressed.

Time For Argument: Patent Owner respectfully requests 30 minutes of total argument time per side. Patent Owner believes that this is sufficient time to discuss all issues in this case.

DATED: May 6, 2026

Respectfully submitted,

By: /s/ Anthony E. Dowell
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ATTORNEY FOR PATENT OWNER

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2026, I caused a true and correct copy of the foregoing materials to be served via the Patent Office electronic filing system, and electronic service via email to the following attorneys of record pursuant to Petitioner's consent:

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