

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc.,
Ericsson Inc., and Telefonaktiebolaget LM Ericsson
Petitioners,

v.

TracBeam, LLC,
Patent Owner.

Case IPR2015-01687
Patent 7,764,231

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

Submitted Electronically via the Patent Review Processing System

**PETITIONERS' REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70**

Pursuant to 37 C.F.R. § 42.70, the Board’s Scheduling Order (Paper No. 11), and the Petitioners’ and Patent Owner’s Stipulated Request to Amend the Schedule (Paper No. 12), T-Mobile US, Inc., T-Mobile USA, Inc., TeleCommunication Systems, Inc., Ericsson Inc., and Telefonaktiebolaget LM Ericsson (collectively, “Petitioners”) hereby request oral argument. The Board has already scheduled oral argument for November 8, 2016. *See* Scheduling Order (Paper No. 11) at 5, 7; *see also* Nov. 2016 PTAB Public Hearing Schedule (Oct. 12, 2016), https://www.uspto.gov/sites/default/files/documents/ptab_nov16_101216.pdf. The Board also scheduled a hearing on the same date in the related IPR2015-01681 proceeding. *See id.* Case IPR2015-01681 involves the same patent at issue in this proceeding. Accordingly, Petitioners respectfully request that the Board consolidate oral argument for IPR2015-01681 and IPR2015-01687. Petitioners also request permission to use audio-visual equipment to display possible demonstrative exhibits.

Pursuant to 37 C.F.R. § 42.70(a), Petitioner s specify the following issues to be argued in this proceeding:

ISSUES TO BE ARGUED

- A. The grounds on which the instant *inter partes* review proceeding was instituted, namely the unpatentability of Claims 20 and 25 over U.S.

Patent No. 5,936,572 to Loomis in view of U.S. Patent No. 6,748,226
to Wortham.

- B. Any issues specified by Patent Owner in a request for oral argument.
- C. Rebuttal to Patent Owner's presentation on all matters.

Respectfully submitted,

BAKER BOTTS L.L.P.

Attorneys for Petitioner

A handwritten signature in black ink, appearing to read "B. W. Oaks", with a stylized, cursive flourish at the end.

Brian W. Oaks

Reg. No. 44,981

Date: October 17, 2016

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 17th day of October, 2016, a complete and entire copy of this **PETITIONER'S REQUEST FOR ORAL ARGUMENT PURSUANT TO 37 C.F.R. § 42.70** was served on Patent Owner via email at the following correspondence addresses:

- sean@dovellaw.com
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CERTIFICATE OF SERVICE



October 17, 2016

Date

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Inc., T-Mobile USA, Inc.,
Telecommunication Systems, Inc., Ericsson
Inc., and Telefonaktiebolaget LM Ericsson.