

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC.,  
Petitioner,

v.

CENTRIPETAL NETWORKS, INC.,  
Patent Owner.

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Case No. IPR2018-01512  
Patent No. 9,565,213

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a) and the Board's March 20, 2019

Scheduling Order (Paper No. 9), Centripetal Networks, Inc. ("Patent Owner") requests an opportunity to present oral argument regarding the patentability of claims 1–16 (the "Challenged Claims") of U.S. Patent No. 9,565,213 ("the '213 Patent"). The oral argument is scheduled to be held on December 18, 2019. Paper No. 9 at 9. Without waiving consideration of any issue not identified below, Patent Owner requests one hour to address the following issues:

1. Whether Petitioner has met its burden of proving that Claims 1–9 are unpatentable as obvious over the combination of Cisco ACNS Software Configuration Guide for Centrally Managed Deployments, Release 5.5 ("ACNS") and U.S. Patent No. 9,172,627 ("Kjendal");
2. Whether Petitioner has met its burden of proving that Claims 10–16 are unpatentable as obvious over the combination of ACNS, Internet Engineering Task Force (IETF) Request for Comment (RFC 2475) titled "An Architecture for Differentiated Services" ("Diffserv"), and Kjendal;
3. Secondary considerations of non-obviousness;
4. Patent Owner's and Petitioner's Motion to Exclude Evidence, if any;
5. Rebuttal of any arguments made by Petitioner;
6. Any additional issues on which the Board seeks clarification; and

7. Response to any issues Petitioner raises in its Request for Oral  
Argument.

Patent Owner respectfully reserves the right to supplement and/or amend the  
foregoing statement of issues to the extent the Rules permit.

At oral argument, Patent Owner requests the use of audio/visual equipment  
to display demonstrative exhibits, including the use of a projector and screen.

Respectfully submitted,

Dated: November 6, 2019

/James Hannah/

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(Case No. IPR2018-01512)

*Attorneys for Patent Owner*

**CERTIFICATE OF SERVICE**

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on the Petitioner as detailed below.

*Date of service*      November 6, 2019

*Manner of service*    Electronic Mail (dmcdonald@merchantgould.com;  
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*Documents served*    PATENT OWNER'S REQUEST FOR ORAL  
ARGUMENT

*Persons Served*      Daniel W. McDonald  
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