

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RESIDEO TECHNOLOGIES, INC. and
CENTRAL SECURITY GROUP – NATIONWIDE, INC.,¹
Petitioners,
v.
UBIQUITOUS CONNECTIVITY, LP,
Patent Owner.

Case IPR2019-01335

Patent 8,064,935 B2

PATENT OWNER’S REQUEST FOR ORAL ARGUMENT

¹ Central Security Group – Nationwide, Inc., who filed a petition in IPR2019-01609, has been joined as a petitioner in this proceeding.

Pursuant to the Board's Scheduling Order, Patent Owner Ubiquitous Connectivity ("Patent Owner") respectfully requests oral argument in the above-identified proceedings, currently scheduled for October 27, 2020.

Pursuant to 37 C.F.R. § 42.70(a), and without waiving the right to raise any additional issues not listed below, Patent Owner requests an oral hearing on the following issues:

1. Any issues raised by Petitioners in these proceedings, including in the Petitions for *Inter Partes* Review and Replies in these proceedings, and including whether the claims of U.S. Patent No. 8,064,935 are patentable.
2. Any issues raised by Patent Owner in these proceedings, including in Patent Owner's Preliminary Response, Patent Owner's Response, and Patent Owner's Surreply.
3. Any issues raised by any of the parties to these proceedings.
4. Any motions to exclude evidence filed by a party to these proceedings.
5. Any other motions or filings pending before this Board.
6. Any additional issues raised by Petitioners in any Request for Oral Argument.
7. Any additional issues raised by this Board or Petitioners at oral argument.

In the interest of efficiency, and consistent with the Board's order setting a single hearing date for both these proceedings and IPR2019-01336 and IPR2019-01610 (which involve a related patent), Patent Owner requests that these related proceedings be consolidated and argued in one hearing. Given the substantial overlap in issues and evidence in the related proceedings, Patent Owner believes it

is appropriate to treat the related proceedings as equivalent to a single proceeding for purposes of determining time needed for argument and that an allocation of one (1) hour per side will be sufficient. Patent Owner also requests the opportunity to reserve a portion of its allocated time for sur-rebuttal.

Pursuant to the USPTO's notice regarding Patent Trial and Appeal Board oral hearings occurring after March 13, 2020, should in-person hearings remain prohibited by October 27, 2020, Patent Owner intends to participate via remote video and/or telephonically.

Should in-person hearings be available by October 27, 2020, Patent Owner requests the ability to use computers at the hearing, as well as audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint presentation. Patent Owner requests that at least five spaces be reserved at the oral hearing.

Respectfully submitted,

Date: September 14, 2020

/Cortney S. Alexander/
Cortney S. Alexander
Reg. No. 54,778
KENT & RISLEY LLC
5755 N Point Pkwy Ste 57
Alpharetta, GA 30022
Phone: 404-855-3867
Fax: 770-462-3299
Email: cortneyalexander@kentrisley.com

CERTIFICATE OF SERVICE

The undersigned certifies that on September 14, 2020, a copy of the foregoing Request for Oral Argument was provided via electronic service to the Petitioner by serving the correspondence addresses of record as follows:

S. Benjamin Pleune (ben.pleune@alston.com)
Christopher T.L. Douglas (christopher.douglas@alston.com)
Adam J. Doane (adam.doane@alston.com)
Alston & Bird LLP
Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
Tel: 704.444.1000
Fax: 704.444.1111

Joshua Griswold
Bret Winterle
Fish & Richardson P.C.
3200 RBC Plaza
60 South Sixth Street
Minneapolis, MN 55402
Tel: 202-783-5070
Fax: 877-769-7945
griswold@fr.com
winterle@fr.com
PTABInbound@fr.com
IPR41313-000001IP1@fr.com

Anita M. C. Spieth
Peter A. Flynn
Stephanie Schonewald
Choate Hall & Stewart
Two International Place
Boston, MA 02110
Tel: (617) 248-5000
Fax: (617) 248-4000

aspieth@choate.com
pflynn@choate.com
sschonewald@choate.com

/Cortney S. Alexander/
Cortney S. Alexander
Reg. No. 54,778
Kent & Risley LLC
5755 N Point Pkwy Ste. 57
Alpharetta, GA 30022
Phone: 404-855-3867
Fax: 770-462-3299
Email: cortneyalexander@kentrisley.com