## UNITED STATES PATENT AND TRADEMARK OFFICE

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## BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RESIDEO TECHNOLOGIES, INC. and
CENTRAL SECURITY GROUP – NATIONWIDE, INC.,

Petitioners

v.

UBIQUITOUS CONNECTIVITY, LP,

Patent Owner.

Case: IPR2019-01335 & IPR2019-01609

U.S. Patent No. 8,064,935

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## PETITIONERS' REQUEST FOR ORAL ARGUMENT

<sup>&</sup>lt;sup>1</sup> Central Security Group – Nationwide, Inc., who filed a petition in IPR2019-01609, has been joined as a petitioner in this proceeding.

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order dated January 27, 2020 (Paper 8), Petitioners Resideo Technologies, Inc. and Central Security Group – Nationwide, Inc. (collectively, "Petitioners"), request Oral Argument on issues related to the patentability of the challenged claims of U.S. Patent No. 8,064,935 (the "935 Patent"). Without intending to waive any issue not specifically identified, Petitioners wish to present arguments on the following issues:

- The proper construction of the term "microcontroller";
- Grounds at issue in this proceeding, including all issues raised by the parties relating to the instituted grounds in this proceeding (Grounds 1A 2D);
- Any issues addressed in Petitioners' papers, including but not limited to, the
   Petition and Petitioners' Reply;
- Rebuttal to Patent Owner's presentation and positions on all issues,
   including the issues listed above and any issues raised in Patent Owner's
   papers, including Patent Owner's Response and Patent Owner's Sur-Reply,
   or elsewhere in the record for this proceeding;
- Any motions to exclude filed by any party;
- Any issues raised in Petitioners' Notice of Objections to Evidence, dated
   May 26, 2020 (Paper 24); and

• Any other issues the Board deems necessary for issuing a final written

decision.

The Board previously scheduled Oral Argument for this case on October 27,

2020 (Paper 8). Petitioners believe that the parties need no more than sixty minutes

per side to present arguments in this case. To the extent the oral argument will be

conducted in-person at the offices of the United States Patent and Trademark

Office, Petitioners respectfully request permission to use audio/visual equipment to

display demonstrative exhibits. To the extent the oral arguments will be conducted

remotely in light of the Covid-19 pandemic, Petitioners respectfully request that

the Board provide a video conferencing platform and a public telephone line.

<u>September 14, 2020</u>

By /S. Benjamin Pleune/

Date

S. Benjamin Pleune (Reg. No. 52,421)

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing

PETITIONERS' REQUEST FOR ORAL ARGUMENT was served electronically
on September 14, 2020 on counsel of record for Patent Owner as follows:

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September 14, 2020

Date

By \_\_/S. Benjamin Pleune/
S. Benjamin Pleune (Reg. No. 52,421)