

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETFLIX, INC.,

Petitioner,

v.

AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED,

Patent Owner.

IPR2020-01582

U.S. Patent No. 8,572,138

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), 35 U.S.C. § 316(a)(10), and the Board's March 15, 2021 Scheduling Order (Paper 10), setting oral argument, if requested, on January 5, 2022, Petitioner respectfully requests an oral argument with one hour of argument time per side. The parties are in agreement that one hour per side is appropriate for this proceeding.

Request for Oral Argument

Petitioner requests (without any intent to waive consideration of any issue not requested) to address the following issues at the oral hearing:

- Ground 1: Claims 1-5, 9, 19-21, and 26 are rendered obvious by Khandekar (Ex. 1004);
- Ground 2: Claims 1-5, 9, 19-21, and 26 are rendered obvious by Khandekar in view of Le (Ex. 1005);
- Ground 3: Claims 9 and 10 are rendered obvious by Khandekar in view of Le and Sidebottom (Ex. 1006);
- Ground 4: Claim 17 is rendered obvious by Khandekar in view of Le and Stone (Ex. 1007);
- 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.

Petitioner requests the ability to reserve a portion of its total time for presenting rebuttal arguments after Patent Owner's presentation. Petitioner additionally requests that the Board provide the capability to display demonstrative exhibits, for displaying documents of record. In accordance with the Trial Practice Guide, Fed. Reg. Vol. 77, No. 157, at 48768, Petitioner will contact the Board Trial Division paralegal to discuss this request.

This Request is timely, being filed on October 29, 2021.

Date: October 29, 2021

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
/Harper Batts/
Harper Batts (Reg. No. 56,160)
Attorney for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on October 29, 2021, a complete and entire copy of the foregoing document was filed with the PTAB through its E2E system and served via email on attorneys of record at the following addresses:

Daniel S. Young (Reg. No. 48,277)
dyoung@adseroip.com
dyoung@sbiplaw.com

Chad E. King (Reg. No. 44,187)
chad@adseroip.com
cking@sbiplaw.com

ADSERO IP LLC d/b/a
Swanson & Bratschun LLC
8210 Southpark Terrace
Littleton, CO 80120

Date: October 29, 2021

/Harper Batts/
Harper Batts (Reg. No. 56,160)
Attorney for Petitioner