

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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**UNIFIED PATENTS, LLC,**

Petitioner

v.

**VL COLLECTIVE IP LLC,**

Patent Owner

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IPR2022-01086  
U.S. Patent 8,605,794

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

In accordance with 37 C.F.R. § 42.70(a), Patent Owner requests an oral argument for this *inter partes* review. The Board's Scheduling Order sets the oral argument, if requested, for September 19, 2023. (Paper 9, at 11.)

Patent Owner requests a remote virtual hearing with one hour of oral argument per side and the opportunity to address all issues raised in the papers, including:

- How challenged claims 1, 3, 5, 9, 12, 13, 15, 20, and 21 are patentable under grounds 1-4 presented in the Petition (Paper 2);
- All issues raised in the Board's Institution Decision (Paper 8);
- All arguments raised in Patent Owner's Response (Paper 20), Petitioner's Reply (Paper 23), and Patent Owner's Sur-reply (Paper 26), including the parties' claim construction and prior art arguments;
- All issues raised in any paper of record in this proceeding;
- All issues raised by Petitioner in its request for oral argument; and
- All issues raised by the Board during the oral argument or for which the Board seeks clarification.

If the Board has any questions or comments, counsel for Patent Owner can be available at the Board's convenience.

Dated: August 7, 2023

Respectfully submitted,

/s/ Christine E. Lehman/

Christine E. Lehman (Reg. No. 38,535)  
clehman@reichmanjorgensen.com  
REICHMAN JORGENSEN LEHMAN &  
FELDBERG LLP  
1909 K Street, NW, Suite 800  
Washington, DC 20006  
Telephone: (202) 894-7311  
Facsimile: (650) 623-1449

*Lead Counsel for Patent Owner*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served on August 7, 2023, via electronic mail, as agreed to by counsel, upon the following counsel for Patent Owner:

Raghav Bajaj  
raghav.bajaj.ipr@haynesboone.com  
David L. McCombs  
david.mccombs.ipr@haynesboone.com  
HAYNES & BOONE, LLP  
2323 Victory Ave. Suite 700  
Dallas, TX 75219

Jonathan R. Bowser  
jon.bowser.ipr@haynesboone.com  
HAYNES AND BOONE, LLP  
800 17th Street NW, Suite 500  
Washington, DC 20006

Roshan Mansinghani  
roshan@unifiedpatents.com  
Jessica L. A. Marks  
jessica@unifiedpatents.com  
Unified Patents, LLC  
4445 Willard Ave., Suite 600  
Chevy Chase, MD 20815

Dated: August 7, 2023

/Jaime F. Cardenas-Navia/  
Jaime F. Cardenas-Navia  
Admitted *Pro Hac Vice*