UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROBERT BOSCH LLC, and
MERCEDES-BENZ USA, LLC,
Petitioner,

v.

WESTPORT FUEL SYSTEMS CANADA INC.,
Patent Owner

Case No. IPR2023-00292
Patent No. 6,298,829

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
37 C.F.R §42.70

Pursuant to 37 C.F.R. §42.70 and the Board's Scheduling Order, Patent Owner Westport Fuel Systems Canada Inc. ("Patent Owner") respectfully submits this Request for Oral Argument. The Board has currently scheduled the oral hearing in IPR2023-292 for November 14, 2024. Patent Owner requests, without intending to waive any issue not specifically identified, to address the following issues at the oral argument:

- Whether claims 1-3, 6, 11-12, 14-15, and 18-19 of U.S. Patent No. 6,298,829 ("the '829 Patent") are unpatentable under 35 U.S.C. §103 as obvious in view of Wirbeleit and Klügl;
- Whether claim 20 of the '829 Patent is unpatentable under 35 U.S.C. §103 as obvious in view of Wirbeleit, Klügl, and Newcomb;
- Whether claims 1-3, 6, 11-12, 14-15, and 18-19 of the '829 Patent are unpatentable under 35 U.S.C. §103 as obvious in view of Klügl and Hayes;
- Whether claim 20 of the '829 Patent is unpatentable under 35 U.S.C. §103 as obvious in view of Klügl, Hayes, and Newcomb;
- Any other issue raised by the parties' papers;
- Any subsidiary issues including, but not limited to, claim construction, assessment of evidence, and admissibility and sufficiency of evidence;
- Any issues on which Petitioner requests oral argument;

- Any issue raised by any motion to exclude; 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.

The Board also has scheduled an oral hearing on November 14, 2024, for one related proceeding: IPR2023-00293. Patent Owner requests that both proceedings (IPR2023-00292, IPR2023-00293) be combined into a single hearing. Patent Owner believes that one hour per side is an appropriate amount of time for the combined argument, and requests the hearing be in-person at the USPTO in Alexandria or other USPTO location convenient for the Board. Patent Owner also requests the ability to reserve a portion of its total time for presenting sur-rebuttal arguments after Petitioner's rebuttal. Patent Owner requests permission to use audio-visual equipment to display demonstrative exhibits, including the use of a projector/screen for a PowerPoint display or the like.

Dated: September 24, 2024

Respectfully submitted,

/s/ David W. Higer

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), the undersigned certifies that on September 24, 2024, a complete and entire copy of Patent Owner's Request for Oral Argument was served on Petitioners by email to the following email addresses:

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