UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC., and
PORSCHE CARS NORTH AMERICA, INC.,
Petitioner

v.

YECHEZKAL EVAN SPERO,
Patent Owner

Case IPR2023-00318[1]
U.S. Patent No. 9,955,551

PETITIONER VOLKSWAGEN GROUP OF AMERICA, INC.'S REQUEST FOR ORAL ARGUMENT

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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[1] Porsche Cars North America, Inc., which filed a petition in IPR2023-01296, has been joined as a party to this proceeding.

Pursuant to the Board's July 11, 2023, Scheduling Order (Paper 12), Petitioner Volkswagen Group of America, Inc. ("Petitioner"), respectfully requests oral argument, currently scheduled for March 20, 2024. Petitioner requests that oral argument in this proceeding be consolidated with oral argument in related proceeding IPR2023-00315 (also for U.S. Patent No. 9,955,551). Petitioner requests a total of 90 minutes in which to present its arguments in the combined hearing. The parties have conferred and agreed with the requested combined hearing and allotted time for these proceedings. Under 37 C.F.R. § 42.70, and without intending to waive any issue not specifically identified, Petitioner specifies the following issues to be argued:

1. Claims 56, 57, 62–65, 70–73, 78–81, and 86–87 of U.S. Patent No. 9,955,551 ("the '551 patent") are unpatentable under 35 U.S.C. § 103(a) over Beam and Satonaka;
2. Claims 58–61, 66–69, 74–77, and 82–85 of the '551 patent are unpatentable under 35 U.S.C. § 103(a) over Beam, Satonaka, and Kobayashi;
3. Claims 56, 57, 62–65, 70–73, 78–81, and 86–87 of the '551 patent are unpatentable under 35 U.S.C. § 103(a) over Karlsson and Nakamura;
4. Claims 58–61, 66–69, 74–77, and 82–85 of the '551 patent are unpatentable under 35 U.S.C. § 103(a) over Karlsson, Nakamura, and

Gotou;

5. Any issues specified by Patent Owner in its Request for Oral Argument; and
6. Any other issues the Board deems necessary for issuing a final written decision (e.g., any motion to exclude evidence and any motion to seal evidence).

Petitioner also requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector and screen for displaying documents from a computer.

Further, Petitioner requests that the hearing be held at the USPTO's Alexandria, Virginia office because that location will be more convenient, have simpler logistics, and be less costly for Petitioner. Petitioner notes that its counsel are located in the Washington, DC area.

Respectfully submitted,
STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

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Date: February 7, 2024

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER VOLKSWAGEN GROUP OF AMERICA, INC.'S REQUEST FOR ORAL ARGUMENT** was served in its entirety on February 7, 2024 upon the following parties via electronic mail:

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