

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIEMENS MOBILITY, INC., GROUND TRANSPORTATION SYSTEMS USA,
INC., HUMATICS CORP., and PIPER NETWORKS, INC.,

Petitioners,

v.

METROM RAIL, LLC

Patent Owner.

Inter Partes Review No. IPR2023-00468
Patent 9,043,131

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Patent Owner's Request for Oral Argument
U.S. Patent No. 9,043,131

Under 37 C.F.R. §42.70(a) and the Board's Scheduling Order Patent Owner Metrom Rail, LLC ("Patent Owner") respectfully requests oral argument. Patent Owner has conferred with Petitioners regarding this request.

Without prejudice to contentions of untimeliness, the issues to be argued include:

1. Whether the challenged claims of U.S. Patent No. 9,043,131 are unpatentable based on the grounds raised in the Petition;
2. Any issues raised by Petitioner or Patent Owner in this proceeding, including the Petition for *Inter Partes* Review, Patent Owner Response, Replies and Sur-Replies;
3. Any Motions to Strike or Exclude Evidence filed by Petitioner or Patent Owner;
4. Any other motions or filings pending before this Board;
5. Any additional issues raised by the panel or the parties at oral argument.

As for oral argument logistics, the parties do not object to combining oral argument with IPR2023-00470, scheduled as Due Date 8, March 22, 2024. Patent Owner requests an in person hearing in Alexandria, Virginia and understands an Order will be forthcoming setting the hearing time.

Patent Owner requests the use of software and equipment to display demonstratives and exhibits to the Board and other participants during the oral

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argument (such as a projector and screen for a PowerPoint presentation). Additionally, if possible, Patent Owner requests video and/or telephonic access for at least one client representative to observe the oral argument remotely. Petitioners have requested that additional individual attorneys be permitted to optionally attend by video conference.

Patent Owner anticipates that one hour per side will be sufficient for the oral argument for both this matter and IPR2023-00470.

Date: February 7, 2024

Respectfully submitted,

/Gregory C. Schodde/

Gregory C. Schodde

Reg. No. 36,668

McAndrews, Held & Malloy, Ltd.

500 West Madison Street, 34th Floor

Chicago, Illinois 60661

(312) 775-8000

(312) 775-8100

gschodde@mcandrews-ip.com

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on February 7, 2024, a copy of Patent Owner's Patent Owner's Request for Oral Argument was served via email to the Petitioners' counsel at:

howard@wisnialaw.com
nspeed@wolfgreenfield.com
gnieberg-ptab@wolfgreenfield.com
vgalluzzo@crowell.com
msupko@crowell.com
jjames@crowell.com
kschmitz@crowell.com
thatcher.rahmeier@faegredrinker.com
zach.kachmer@faegredrinker.com
ncunningham@dority-manning.com
smoore@dority-manning.com

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/Gregory C. Schodde/

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