

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.

Case No. IPR2023-00470

Patent No. 8,812,227

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's Scheduling Order dated June 23, 2023 (Paper 12),
Petitioners Siemens Mobility, Inc., Ground Transportation Systems USA, Inc.,
Humatics Corp., and Piper Networks, Inc. respectfully request oral argument in the
above-identified proceeding, currently scheduled for March 22, 2024 (Paper 12 at
11). Pursuant to 37 C.F.R. § 42.70(a), and without waiving the right to raise any
additional issues not listed below, Petitioners request an oral hearing on the
following issues:

1. Any issues raised in the Petition and Reply, including whether claims
1-28 of U.S. Patent No. 8,812,227 are unpatentable over one or more of Grounds
1A-3F;
2. Any issues raised in the Board's Institution Decision (Paper 11);
3. Any issues raised by Patent Owner Metrom Rail, LLC in these
proceedings, including the Patent Owner Response and Patent Owner Sur-Reply in
this proceeding;
4. Any other issues raised by Petitioners, Patent Owner, or the Board
during these proceedings;
5. Any Motions to Exclude Evidence filed by Petitioners or Patent
Owner;
6. Any other motions or filings pending before this Board, including but
not limited to Patent Owner's Motions to Submit Supplemental Information

Pursuant to 37 C.F.R. Section 42.123 (Paper 38 and 42), the Joint Motion to Expunge Patent Owner's Submission of Supplemental Evidence (Paper 46), and Patent Owner's Motion to Strike (Paper 48);

7. Any additional issues raised by Patent Owner in its Request for Oral Argument; and

8. Any additional issues raised by this Board or Patent Owner at oral argument.

Petitioners respectfully submit that this proceeding sufficiently overlaps with that of IPR2023-00468 such that a combined hearing would be most efficacious, and that 60 minutes per side would be most appropriate for oral argument.

Petitioners request an in person hearing in Alexandria, Virginia. Petitioners also request the use of software and equipment to display demonstratives and exhibits to the Board and other participants during the oral argument (such as a projector and screen for a PowerPoint presentation). Additionally, Petitioners request that backup counsel and client representatives be permitted to optionally attend by video conference.

Dated: February 9, 2024

By: /s/ Vincent J. Galluzzo
Vincent J. Galluzzo (Reg. No. 67,830)
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Washington, DC 20004
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 9, 2024, a true and correct copy of the foregoing Petitioners' Request for Oral Argument was served by electronic mail on the following email address:

MetromIPR@mcandrews-ip.com

Dated: February 9, 2024

By: /s/ Vincent J. Galluzzo
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