

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

QUASAR SCIENCE LLC

Petitioner,

v.

COLT INTERNATIONAL CLOTHING, INC. d/b/a COLT LED

Patent Owner.

---

Case: IPR2023-00613  
U.S. Patent No. 10,411,582

---

**PETITIONER'S REQUEST FOR ORAL ARGUMENT**

---

Pursuant to 37 C.F.R. § 42.70 and the Scheduling Order (IPR2023-613, Paper 9), Petitioner QUASAR SCIENCE LLC (“Petitioner”) submits this Request for Oral Argument on the following issues:

1. Whether the challenged claims of U.S. Patent No. 10,411,582 are unpatentable.
2. Any claim construction issues.
3. Any procedural and/or evidentiary issues.
4. Rebuttal to Patent Owner’s presentation on all matters.
5. Any other issues related to invalidity that the Board deems necessary for issuing a final written decision.

Petitioner requests that 1 hour be allotted for combined oral argument for IPR2023-00613 and IPR2023-00614, due to the overlap in the cases. Petitioner notes that in a separate request, Petitioner requests that each side be allotted 45 minutes total for oral argument for the related case of IPR2023-00611. Thus, Petitioner seeks that each side be allotted a combined total of 1 hour and 45 minutes for oral argument for all three IPRs. Petitioner also requests that the oral argument be held in-person at the USPTO headquarters in Alexandria. Patent Owner agrees with Petitioner’s request 1 hour of oral argument for each side in IPR2023-00613 and IPR2023-00614, but Patent Owner seeks to have the oral argument virtually. Patent Owner indicated

IPR2023-00613

U.S. Patent No. 10,411,582

that it would not request oral argument for IPR2023-00611. Petitioner requests the ability to use audio/visual equipment to display demonstratives and exhibits at the oral hearing, to the extent available at the time of the hearing. Petitioner also requests that the attorneys at Petitioner's counsel table be allowed to use computers.

Dated: May 28, 2024

Respectfully submitted:

/Trenton Ward/

Trenton Ward (Reg. No. 59,157)

Greenberg Traurig, LLP

Terminus 200

3333 Piedmont Road NE, Suite 2500

Atlanta, GA 30305

trenton.ward@gtlaw.com

*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

In accordance with § 42.6(e)(1), the undersigned certifies that on the 28th day of May 2024, the above **PETITIONER’S REQUEST FOR ORAL ARGUMENT** was served, via electronic mail upon the following counsel for Patent Owner:

David L. Hoffman (Reg. No. 32,469)  
dhoffman@nolanheimann.com  
Nolan Heimann LLP  
16000 Ventura Blvd., Suite 1200  
Encino, CA 91436  
Direct 818-946-1158

Everett Diederiks (Reg. No. 33,323)  
ediederiks@dwpatentlaw.com  
Diederiks & Whitelaw, PLC  
4196 Merchant Plaza, #815 Woodbridge,  
VA 22192  
703-583-8300

Nicholas Whitelaw (Reg. No. 36,418)  
nwhitelaw@dwpatentlaw.com  
Diederiks & Whitelaw, PLC  
4196 Merchant Plaza, #815 Woodbridge,  
VA 22192  
703-583-8300

Dated May 28, 2024

Respectfully submitted:

/Trenton Ward/  
Trenton Ward (Reg. No. 59,157)  
Greenberg Traurig, LLP  
Terminus 200  
3333 Piedmont Road NE, Suite 2500  
Atlanta, GA 30305  
Telephone: 678-553-2100  
Facsimile: 678-553-2212  
trenton.ward@gtlaw.com

*Attorney for Petitioner*