

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY, GENERAL MOTORS LLC, and
NISSAN NORTH AMERICA INC.,¹
Petitioner,

v.

NEO WIRELESS LLC,
Patent Owner.

Case IPR2023-00763
Patent 10,447,450

**PATENT OWNER NEO WIRELESS LLC'S
REQUEST FOR ORAL ARGUMENT**

¹ General Motors LLC and Nissan North America, Inc. were joined as a petitioner to this proceeding based on a petition and motion for joinder filed in IPR2023-00962, which were granted.

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order (Paper 31), Neo Wireless LLC (“Patent Owner”) respectfully requests oral argument, as currently scheduled for June 10, 2025.

Time Allotment: In view of the multiple issues raised, Patent Owner respectfully requests 1 hour (60 minutes) per side for argument.

Request For In-Person Hearing: Patent Owner respectfully requests an in-person hearing in Alexandria, or at another location that may be most convenient for the Board.

Reservation of Time: Patent Owner requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Compare, e.g., Mangrove Partners Master Fund, Ltd. et al. v. VirnetX, Inc.*, IPR2015-01046/01047, Paper 60, 2 (June 2, 2016) (“Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.”).

Issues for Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

- Issues related to the instituted grounds, including, for example, claim construction, level of ordinary skill in the art, anticipation, obviousness, analogous art, motivation to combine, and reasonable expectation of success;

- The timeliness of the arguments raised in the proceedings;
- Responses to any arguments made by Petitioner;
- Any other relevant issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed; 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's advance guidance is respectfully solicited as to any questions the Board specifically wishes to be addressed.

Equipment: Should the Board order an in-person hearing, Patent Owner requests the ability to use a computer, projector, and screen to display possible demonstratives and exhibits.

Respectfully submitted,

/ Parham Hendifar/
Parham Hendifar (Reg. No. 71,470)
Kenneth J. Weatherwax (Reg. No. 54,528)
LOWENSTEIN & WEATHERWAX LLP

Date: May 1, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service on the date signed below:

PATENT OWNER NEO WIRELESS LLC'S REQUEST FOR ORAL ARGUMENT

The names and address of the parties being served are as follows:

John S. LeRoy	FPGP0138IPR@brookskushman.com
Christopher Smith	
Kyle G. Konz	
Timothy Riffe	IPR18768-0206IP2@fr.com
Usman Khan	PTABInbound@fr.com
Reginald J. Hill	rhill@jenner.com
Nicole A Keenan	nkeenan@jenner.com

Respectfully submitted,

/ Abigael Neufeld /

Date: May 1, 2025