

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN CHIC ELECTRICS CO., LTD.,

Petitioner,

v.

PILOT, INC.,

Patent Owner.

CASE: IPR2023-00810

Patent No. 11,376,971 B2

PETITIONER'S STATEMENT REGARDING ORAL ARGUMENT

Pursuant to the Board's Scheduling Order of November 8, 2023 (Paper 13), Petitioner respectfully submits that oral argument is not necessary in this proceeding due to a recent filing made by Patent Owner at the USPTO disclaiming the entire term of Patent No. 11,376,971 B2 in accordance with 37 C.F.R. § 1.321(a) and 35 U.S.C. § 253. (Exhibit 2002.) Because the Patent Owner has disclaimed every claim of the '971 patent, the Patent Owner has requested this IPR be terminated as moot. (Paper 16.)

If, however, the Board determines that the proceeding should not be terminated as moot, or otherwise terminated, and that Oral Argument should proceed in this IPR on August 14, 2024, Petitioner submits this request to participate in the Oral Argument. Additionally, Petitioner submits its preference to proceed with oral argument virtually by video conference. If oral argument will be conducted in-person at the offices of the United States Patent and Trademark Office, Petitioner respectfully requests that the Board provide audio/visual equipment for displaying demonstrative exhibits and evidence of record during oral argument, including a projector and screen for displaying documents. If oral argument will be conducted by video conference, Petitioner respectfully requests that the Board provide a video conferencing platform that will allow demonstrative exhibits and evidence to be viewed by all participants of the video conference.

At the oral hearing, Petitioner intends to discuss the issues raised or discussed

in the parties' filings and the Board's Institution Decision in the ongoing IPR proceeding, and any issues raised by Patent Owner or the Board at the hearing.

If the Board would like to discuss the recent filings made by Patent Owner and the potential termination of this IPR proceeding, Petitioner will make itself available to the Board and Patent Owner.

Dated: June 27, 2024

Respectfully submitted,

/Kevin J. Patariu/

Lead Counsel,
Kevin J. Patariu, Reg. No. 63,210

Back-Up Counsel,
Bing Ai, Reg. No. 43,312
John D. Esterhay, Reg. No. 73,512
John P. Schnurer, Reg. No. 52,196

Attorneys for Petitioner

Perkins Coie LLP
11452 El Camino Real, Suite 300
San Diego, California 92130
Phone: 858-720-5700

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing PETITIONER’S STATEMENT REGARDING ORAL ARGUMENT was served in its entirety this 27th day of June, 2024 by electronic mail on the Patent Owner via its attorneys of record:

Robert R. Brunelli, Esq. - rbrunelli@sheridanross.com

Jason H. Vick - jvick@sheridanross.com

Pilot-ShenzhenIPR-ServiceSR@sheridanross.com

Dated: June 27, 2024

Respectfully submitted,

Perkins Coie LLP
1201 Third Avenue Suite 4900
Seattle, WA 98101-3099

/Meghan Bright/
Meghan Bright
Patent Paralegal