

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

AUTONOMOUS DEVICES, LLC,
Patent Owner

Case: IPR2023-01055
U.S. Patent No. 11,238,344

**PATENT OWNER'S NOTICE REGARDING
REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. §42.70(a) and the Board’s Scheduling Order (Paper 21), Patent Owner Autonomous Devices, LLC (“Patent Owner”) respectfully informs the Board that it does not intend to request an oral argument in the present *inter partes* review. Patent Owner believes that all of the outstanding issues can be decided on the thorough briefing, and in order to conserve Board and Party resources, Patent Owner does not intend to request oral argument in this proceeding.

Patent Owner understands that Petitioner intends to request oral argument. To the extent that the Board decides to hold an oral argument in the proceeding, Patent Owner intends to appear and present argument. In that circumstance, because the patent challenged in this proceeding is in the same patent family as one other patent that is also set for IPR oral argument on the same day and before the present proceeding’s panel, Patent Owner believes that a consolidated oral argument covering both patents/IPRs would be efficient and practical for the parties and the Board, as explained below.

In particular, the following patents are the subject of IPRs set for oral argument on the same date (September 18, 2024) according to the respective scheduling orders: U.S. Patent 11,238,344 (IPR2023-01055); U.S. Patent 10,452,974 (IPR2023-01054). If the Board grants Petitioner’s request for oral argument, Patent Owner respectfully requests an in-person hearing in Alexandria, Virginia for the oral hearing, in a consolidated format whereby each party will have

120 minutes to present oral argument regarding any and all issues raised in the papers of these proceedings pertaining to the instituted grounds, including:

- Grounds at issue in the proceedings;
- Any issue raised in any paper of record in the proceedings;
- Motion to exclude filed in the proceedings (if any);
- Any issues raised by Petitioner in its request for oral argument;
- Rebuttal to Petitioner's presentation on all issues, including the issues listed above;
- Any issues raised by the Board during the argument or for which the Board seeks clarification; and
- Any other issues the Board deems necessary for issuing a final written decision.

In light of the common specification and drawings for the two patents in these proceedings, and similar prior art issues in these proceedings, Patent Owner believes such a consolidated format will promote efficiency and clarity. In the requested format, the parties would allocate their allotted time (120 minutes) across the proceedings as they deem appropriate.

If the hearing is in-person, Patent Owner anticipates that five or fewer individuals will attend the oral argument on its behalf. Patent Owner respectfully requests the ability to use audio/visual equipment to display demonstratives or

exhibits at the oral hearing, to the extent available at the time of the hearing, to the extent any hearing is held.

Dated: August 1, 2024

Respectfully submitted,

/Arvind Jairam/

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Counsel for Patent Owner

CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of this **PATENT OWNER'S NOTICE REGARDING REQUEST FOR ORAL ARGUMENT** has been served on Petitioner via email on the following counsel of record for Petitioner:

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Dated: August 1, 2024

By: /Arvind Jairam/
Arvind Jairam, Reg. No. 62,759