

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

AUTONOMOUS DEVICES, LLC
Patent Owner.

IPR2023-01169
U.S. Patent No. 10,607,134

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Petitioner submits this Request for Oral Argument on all of the instituted grounds of unpatentability of U.S. Patent No. 10,607,134.

Patent Owner informed Petitioner by email on August 19th that it may request that the Board reschedule the hearing in this proceeding from October 2nd as provided in the Scheduling Order to October 3rd, which is the same date that hearings are also scheduled to occur in IPR2023-01172 and -01173. Patent Owner also indicated that it may request a consolidated hearing for all three cases. Petitioner does not oppose rescheduling the hearing in IPR2023-01169 from October 2nd to October 3rd if the Board consolidates the hearings in IPR2023-01172 and -01173. However, Petitioner does oppose further consolidation of the hearing in the present proceeding with the hearings in IPR2023-01172 and -01173. The present proceeding involves a challenge to a different patent based on different prior art and further involves a motion to amend that was not at issue in IPR2023-01172 or -01173. Accordingly, Petitioner submits that the hearing for IPR2023-01169 should be conducted separately from a consolidated hearing in IPR2023-01172 and IPR2023-01173.

During the hearing, Petitioner requests (without waiving consideration of any issue not listed below) to address at least the following issues:

1. Any issue raised during these proceedings by the Board, Patent Owner, or Petitioner;
2. Rebuttal to Patent Owner's remarks on record or during the oral hearing; and
3. Any additional clarification the Board may seek.

Petitioner requests that the hearing be conducted virtually by videoconference. Petitioner requests a total of 60 minutes for each side to present arguments at the hearing in this proceeding.

Respectfully submitted,

Dated: 08/26/2024

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on August 26, 2024, a complete and entire copy of this Petitioner's Request for Oral Argument was provided via email, to the Patent Owner by serving the email correspondence addresses of record as follows:

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