

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

AUTONOMOUS DEVICES, LLC,
Patent Owner

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

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

Pursuant to 37 C.F.R. §42.70(a) and the Board’s Scheduling Order (Paper 20), Patent Owner Autonomous Devices, LLC (“Patent Owner”) respectfully requests an oral argument in the present *inter partes* review (IPR). Patent Owner requests that the oral argument for the present IPR proceeding be moved from the currently scheduled date of October 2, 2024, to October 3, 2024. In particular, another patent (U.S. Patent 11,055,583) also owned by Patent Owner is the subject of IPR proceedings (IPR2023-01172 and IPR2023-01173) set for oral argument on October 3, 2024, according to the respective scheduling orders in those proceedings. Because the patent challenged in the present proceeding is similar in several respects to the ’583 patent scheduled for IPR oral argument in the -01172 and -01173 proceedings on October 3, 2024, and before the present proceeding’s panel, and with the same parties involved, Patent Owner believes that holding oral argument for all three IPRs on the same day (October 3) would be efficient and practical for the Board and parties. For example, moving the oral argument to October 3 would align the deadlines for demonstrative exchange/objections/filing in the three proceedings and would enable the parties to travel to the oral hearing on a single day instead of on successive days. Patent Owner has conferred with Petitioner on this issue, and Petitioner indicated it does not oppose moving the oral hearing from October 2 to October 3.

Patent Owner respectfully requests an in-person hearing in Alexandria, Virginia for the oral hearing, in a format whereby each party will have 60 minutes to present oral argument regarding any and all issues raised in the papers pertaining to the instituted grounds, including:

- Grounds at issue;
- Any issue raised in any paper of record;
- Motion to exclude filed (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.

Patent Owner also requests consolidation of the oral argument for this proceeding with the oral argument for the -01172 and -01173 proceedings. In light of the common technology for the two patents in these proceedings, Patent Owner believes such a consolidated format will promote efficiency and clarity. In this format, the parties would allocate their allotted time (60 minutes for the -01169 proceeding and 60 minutes combined for the -01172 and -01173 proceedings) across

the proceedings as they deem appropriate. Patent Owner has conferred with Petitioner on this issue, and Petitioner opposes consolidation of the three proceedings and believes that a separate hearing for the -01169 proceeding would be 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.

Dated: August 26, 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 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 26, 2024

By: /Arvind Jairam/
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