

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

AUTONOMOUS DEVICES, LLC
Patent Owner.

IPR2023-01173
U.S. Patent No. 11,055,583

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. 11,055,583.

Petitioner further requests that the hearing for the present proceeding be consolidated with the hearing for IPR2023-01172, which challenges the same patent and involves the same primary prior art reference as that in the present proceeding. To the extent Patent Owner further requests consolidation with the hearing in IPR2023-01169, Petitioner opposes this request. The -01169 proceeding challenges a different patent based on different prior art and further involves a motion to amend that was not at issue in the present proceeding. Accordingly, Petitioner submits that the hearing for IPR2023-01169 should be held separately from a consolidated hearing in IPR2023-01172 and IP2023-01173.

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. If the Board sets a consolidated hearing for IPR2023-01172 and IPR2023-01173, Petitioner requests that each side be allocated 75 minutes to present arguments collectively covering issues in both proceedings. If the Board does not consolidate this hearing with IPR2023-01172, Petitioner requests a total of 60 minutes for each side to present arguments in the hearing for the present proceeding and Petitioner will make a separate request for time in the -01172 proceeding.

The Board has scheduled Oral Hearing for October 3, 2024. *See* Paper 22.

Respectfully submitted,

Dated: 08/26/2024

/Nicholas W. Stephens/
Nicholas Stephens, Reg. No. 74,320
Fish & Richardson P.C.
60 South Sixth Street
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

Counsel for Petitioner

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:

Arvind Jairam Reg. No. 62,759
Stuart McCommas Reg. No. 71,834
MCKOOL SMITH, P.C.
1999 K St. NW, Suite 600
Washington, DC 20006

Scott W. Hejny, Reg. No. 45,882
MCKOOL SMITH, P.C.
300 Crescent Court, Suite 1200
Dallas, TX 75201

George Fishback Reg. No. 76,345
MCKOOL SMITH, P.C.
303 Colorado Street, Suite 2100
Austin, TX 78701

E-mail: Autonomous_IPRs@mckoolsmith.com

/Crena Pacheco/
Crena Pacheco
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
pacheco@fr.com