UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

AUTONOMOUS DEVICES, LLC,
Patent Owner

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

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. §42.70(a) and the Board's Scheduling Order (Paper 22), 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 *inter partes* review proceeding (IPR2023-00173) be consolidated with the oral argument regarding the same challenged patent set for the same day in a different IPR proceeding (IPR2023-01172). Because the '583 patent challenged in the present proceeding is the same patent set for IPR oral argument on October 3, 2024, and before the present proceeding's panel, Patent Owner believes that holding oral argument for both IPRs on the same day in a consolidated format would be efficient and practical for the parties and the Board. Patent Owner has conferred with Petitioner on this issue, and Petitioner does not oppose consolidating the oral hearings in the -01172 and -01173 proceedings.

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 of these proceedings and in IPR2023-01172 (i.e., 60 minutes combined across the -01172 and -01173 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.

Patent Owner also requests consolidation of the oral argument for this proceeding with the oral argument for IPR2023-01169, which is another proceeding involving the same parties as in the present proceeding. In light of the common technology for the two patents challenged in these proceedings, and in light of the same parties being involved 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 (i.e., 120 minutes total across the three proceedings). Patent Owner has conferred with Petitioner on this issue, and Petitioner indicated it opposes consolidation of the -01169 proceeding with the -01172/01173 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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