

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,
Petitioner,

v.

STA GROUP LLC,
Patent Owner.

Case IPR2023-01292

U.S. Patent No. 7,324,802

PETITIONER'S REQUEST FOR ORAL ARGUMENT
37 C.F.R. § 42.70

Pursuant to 37 C.F.R. § 42.70(a), Petitioner respectfully requests the opportunity to present oral argument. As specified in the Board's March 13, 2024 Scheduling Order (Paper No. 12), oral argument for this IPR is scheduled for December 11, 2024.

Petitioner respectfully requests this IPR be argued, with both sides each given sixty (60) minutes in total to argue their respective cases. Petitioner also requests that the oral argument be held **remotely by videoconference**,¹ rather than in person, consistent with the Board's notice that "[t]he Parties may also request that the oral argument instead be held virtually by videoconference." Paper 12 at 6. Petitioner requests the ability to present demonstratives and exhibits to the Board during the videoconference (e.g., using a "screen share" function), and the ability to have additional counsel attend the videoconference from separate locations.

Petitioner requests oral hearing on all instituted grounds of unpatentability, disputed claim constructions, any motions to exclude, any procedural or evidentiary issues raised by the parties, and any additional issues or questions raised by the Board or the parties before or during the oral argument. In particular, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

¹ Petitioner notes that Patent Owner also requested that oral argument be held by videoconference. See Paper No. 26 at 2.

- Ground 1: Claims 1-21 are obvious over Ohel;
- Ground 2: Claims 1-7 and 11-21 are obvious over Nigawara; and
- Ground 3: Claims 3 and 8-10 are obvious over Nigawara in view of Doolin.

Petitioner also requests oral argument on any issues raised by Patent Owner in its Request for Oral Argument.

This filing is timely, being submitted no later than Due Date 4 (October 30, 2024), according to the Scheduling Order (Paper No. 12).

Respectfully submitted,

BAKER BOTTS L.L.P.

/Eliot D. Williams/

Eliot D. Williams (Reg. No. 50,822)

Lead Counsel for Petitioner

Date: October 30, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies on this 30th day of October 2024, that a true and correct copy of the foregoing **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served in its entirety on the following parties via electronic mail:

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Date: October 30, 2024