

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,
Petitioner,

v.

STA GROUP LLC,
Patent Owner.

Case IPR2023-01294

U.S. Patent No. 8,831,664 B2

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 22, 2024 Scheduling Order (Paper No. 13), oral argument for this IPR is scheduled for January 9, 2025.

Petitioner respectfully requests this IPR be argued, with both sides each given forty-five (45) minutes in total to argue their respective cases.¹ Petitioner also requests that the oral argument be held **remotely by videoconference**, 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 13 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

¹ Petitioner and Patent Owner met and conferred on November 5, 2024, and agreed upon the amount of time to be allocated to each side for oral argument in this proceeding.

following issues:

- Ground 1: Claims 1-6, 8-9, and 11-20 are obvious over Downs in view of EDACS;
- Ground 2: Claims 1-6, 8-9, and 11-20 are obvious over Ground 1 in further view of Childress;
- Ground 3: Claims 3-5, 13-14, 18, and 19 are obvious over Ground 1 in further view of Hancock;
- Ground 4: Claims 3-5, 13-14, 18, and 19 are obvious over Ground 2 in further view of Hancock;
- Ground 5: Claims 7 and 10 are obvious over Ground 1 in further view of Reich;
- Ground 6: Claims 7 and 10 are obvious over Ground 2 in further view of Reich;
- Ground 7: Claims 1-2, 6-9, 11-12, 15-17, and 20 are obvious over Kim;
- Ground 8: Claims 3-5, 13-14, and 18-19 are obvious over Ground 7 in view of Ishibashi; and
- Ground 9: Claim 10 is obvious over Ground 7 in view of Goss.

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 (November 8,

2024), according to the Scheduling Order (Paper No. 13).

Respectfully submitted,

BAKER BOTTS L.L.P.

/Eliot D. Williams/

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

Lead Counsel for Petitioner

Date: November 6, 2024

700 K Street, N.W.
Washington, D.C. 20001-5692
202-639-1334
eliot.williams@bakerbotts.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies on this 6th day of November 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:

Jason.Engel.PTAB@klgates.com
Kyle.Kantarek@klgates.com
Nolan.Hubbard@klgates.com
Dennis.Majewski@klgates.com
Brenna.Legaard@klgates.com
Clare.Frederick@klgates.com

BAKER BOTTS L.L.P.

/Eliot D. Williams/

Eliot D. Williams (Reg. No. 50,822)
Lead Counsel for Petitioner

Date: November 6, 2024