

UNITED STATES PATENT AND TRADEMARK OFFICE

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

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper 13), Patent Owner requests a virtual oral argument to be held by videoconference. Patent Owner requests 45 minutes for each side's arguments for the combined, concurrent hearing. Patent Owner specifies the following issues to be argued for IPR2023-01294:

- A. Are Claims 1 to 6, 8, 9, and 11 to 20 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Downs and EDACS?
- B. Are Claims 1 to 6, 8, 9, and 11 to 20 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Downs, EDACS, and Childress?
- C. Are Claims 3 to 5, 13, 14, 18, and 19 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Downs, EDACS, and Hancock?
- D. Are Claims 3 to 5, 13, 14, 18, and 19 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Downs, EDACS, Childress, and Hancock?
- E. Are Claims 7 and 10 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Downs, EDACS, and Reich?
- F. Are Claims 7 and 10 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Downs, EDACS, Childress, and Reich?
- G. Are Claims 1, 2, 6 to 9, 11, 12, 15 to 17, and 20 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Kim?

- H. Are Claims 1, 2, 6 to 9, 11, 12, 15 to 17, and 20 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Kim?
- I. Are Claims 3 to 5, 13, 14, 18, and 19 of U.S. Patent No. 8,831,664 obvious under 35 U.S.C. § 103(a) in view of Kim and Ishibashi?
- J. Issues related to the Board's Decision Instituting Inter Partes Review (Paper 12).
- K. Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Patent Owner reserves the right to address any other arguments presented by Petitioner and any other issues about which the Board wishes to hear argument.

Respectfully submitted,

Dated: November 7, 2024

By: /Jason A. Engel/
Jason A. Engel
Reg. No. 51,654

Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2024, a true and correct copy of the foregoing was caused to be served on the following counsel of record for Petitioners by electronic mail at the following addresses:

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