

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC,
Petitioner

v.

DAEDALUS PRIME LLC,
Patent Owner.

IPR2023-01333
U.S. Patent No. 10,049,080

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

Pursuant to 37 C.F.R. § 42.70(a) and the Board’s Scheduling Order issued November 28, 2023, Petitioner Mercedes-Benz USA LLC (“Petitioner”) respectfully requests oral argument in this proceeding for U.S. Patent No. 10,049,080 (the “’080 Patent”), presently scheduled for November 13, 2024 (Paper No. 11, Scheduling Order). Petitioner requests one hour of argument time, and that the oral argument take place in person at the USPTO’s Alexandria, Virginia headquarters. The parties have conferred and agree on the amount of time for oral argument, but do not agree on location.

Petitioner requests that the following issues be argued in the proceeding:

- Whether the claims 1-4, 7-12, 15-20, and 23-24 of the ’080 Patent are unpatentable in view of Sutardja (Ground 1);
- Whether claims 5-6, 13-14, and 21-22 of the ’080 Patent are unpatentable in view of Sutardja in combination with Rychlik (Ground 2);
- Whether claims 7, 15, and 23 of the ’080 Patent are unpatentable in view of Sutardja in combination with Carmack (Ground 3);
- Whether the claims 51-4, 7-12, 15-20, and 23-24 of the ’080 Patent are unpatentable in view of the ’080 Patent are unpatentable in view of Mathieson in combination with Sutardja (Ground 4);
- Whether claims 5-6, 13-14, and 21-22 of the ’080 Patent are unpatentable

in view of Mathieson in combination with Sutardja and Rychlik (Ground 5);

- Any issues Petitioner raised in its Petition and Reply to the Petition;
- Any issues Patent Owner raised in the Response and Sur-Reply to the Petition;
- Any issues specified by Patent Owner in its request for oral argument;
- Any issues raised in motions to exclude (if any), or any other motion or paper filed in this proceeding; and
- Any other issues that the Board deems necessary for issuing a Final Written Decision.

Petitioner also requests permission to use audio and visual equipment to display demonstratives and exhibits during the hearing.

Date: October 1, 2024

/s/ Celine J. Crowson

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CERTIFICATION OF SERVICE

The undersigned certifies that in accordance with 37 C.F.R. § 42.6(e), the foregoing Request for Oral Argument was served on October 1, 2024 upon the following via electronic mail:

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Date: October 1, 2024

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