

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

MERCEDES-BENZ USA, LLC,  
Petitioner,  
v.  
DAEDALUS PRIME LLC,  
Patent Owner.

---

Case No.: IPR2023-01343  
U.S. Patent No. 8,898,494

---

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**  
**37 C.F.R. § 42.70**

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, DAEDALUS PRIME LLC, respectfully requests oral argument on the issues set forth below via video conference.<sup>1</sup> Oral argument is presently scheduled for November 13, 2024 (Paper No. 11, Scheduling Order). Patent Owner requests one hour of argument time, as agreed with Petitioner.

### **ISSUES TO BE ADDRESSED DURING ORAL ARGUMENT**

- A. The challenged claims of U.S. Pat. No. 8,898,494 are not unpatentable in view of Bose (Ground 1), or in view of Bose in combination with White and Simeral (Ground 2), or Bose in combination with Anderson (Ground 3) or Bose in combination with Anderson and Naffziger (Ground 4).
- B. The challenged claims of U.S. Pat. No. 8,898,494 are not unpatentable in view of White (Ground 5), or in view of White in combination with Anderson (Ground 6), or White in combination with Anderson and Naffziger (Ground 7), or White in combination with Simeral (Ground 8), or White in combination with Simeral and Anderson (Ground 9), or White in combination with Simeral, Anderson, and Naffziger (Ground 10).

---

<sup>1</sup> Patent Owner has been advised that Petitioner, MERCEDES-BENZ USA, LLC, intends to request an in-person hearing.

- C. Any other argument raised in the Patent Owner's Response and/or Sur-reply and replies to any arguments raised in the Petition, Petitioner's Reply, and/or Petitioner's oral argument (if any).
- D. Response to any issues specified by Petitioner in its request for oral argument, if one is filed.
- E. Any outstanding motions or other issues that the Board deems necessary for issuing a Final Written Decision.

Date: October 1, 2024

Respectfully submitted,

/Tarek N. Fahmi/

Tarek N. Fahmi, Reg. No. 41,402  
Ascenda Law Group, PC  
2150 N First St., Suite 420  
San Jose, CA 95131  
1 866 877 4883  
tarek.fahmi@ascendalaw.com

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

### **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

was served on October 1, 2024, by filing this document through the PTAB P-TACT System as well as by delivering a copy via email directed to the attorneys of record for the Petitioner at the following addresses:

Celine J. Crowson  
Joseph J. Raffetto  
Scott Hughes  
Helen Y. Trac  
Ryan Stephenson  
Nicholas Rotz  
Damon M. Lewis  
Jiaxing (Kyle) Xu  
Hogan Lovells US LLP  
555 13th Street N.W.  
Washington, D.C. 20004

Email:  
celine.crowson@hoganlovells.com  
joseph.raffetto@hoganlovells.com  
scott.hughes@hoganlovells.com  
helen.trac@hoganlovells.com  
ryan.stephenson@hoganlovells.com  
nicholas.rotz@hoganlovells.com  
damon.lewis@hoganlovells.com  
kyle.xu@hoganlovells.com

The parties have agreed to electronic service in this proceeding.

Respectfully submitted,

Dated: October 1, 2024

/Tarek N. Fahmi/

Tarek N. Fahmi

Reg. No. 41,402

Ascenda Law Group, PC  
2150 N First St., Suite 420  
San Jose, CA 95131  
Tel: 866-877-4883  
Email: patents@ascendalaw.com