

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC,
Petitioner,

v.

DAEDALUS PRIME LLC,
Patent Owner.

IPR2023-01344
U.S. Patent No. 9,575,895

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Filed on behalf of Petitioner:

Celine Jimenez Crowson (Reg. No. 40,357)
Joseph Raffetto (Reg. No. 66,218)
Scott Hughes (Reg. No. 68,385)
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Pursuant to 37 C.F.R. § 42.70(a) and the Board’s Scheduling Order issued March 5, 2024 (Paper 8), Petitioner Mercedes-Benz USA, LLC (“**Petitioner**”) respectfully requests oral argument in this proceeding for U.S. Patent No. 9,575,895 (the “**’895 Patent**”), currently scheduled for December 9, 2024. Petitioner requests 60 minutes of argument per side, 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 to be argued in the proceeding:

- Whether claims 1, 3-7, 11-13, and 15-17 of the ’895 Patent are anticipated or rendered obvious by *IBM POWER7 multicore server processor* to Sinharoy et al. (“**Sinharoy**”) (Ground 1a);
- Whether claims 2 and 10 of the ’895 Patent are rendered obvious by Sinharoy in view of *Explorations of Optimal Core and Cache Placements for Chip Multiprocessor* to Thomas Canhao Xu et al. (“**Xu**”) (Ground 1b);
- Whether claims 8-9 and 14 of the ’895 Patent are rendered obvious by Sinharoy in view of *DMA Cache: Using On-Chip Storage to Architecturally Separate I/O Data from CPU Data for Improving I/O*

Performance to Tang et al. (“**Tang**”) (Ground 1c);

- Whether claims 1, 5-9, 11-14, 15, and 17 of the '895 Patent are anticipated or rendered obvious by Tang (Ground 2a);
- Whether claims 2, 3-4, 10, and 16 of the '895 Patent are rendered obvious by Tang in view of U.S. Published Patent Application No. 2009/0164739 (“**Harikumar**”) (Ground 2b);
- Any issues Petitioner raised in its Petition and Reply in support of 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 23, 2024

Respectfully submitted,

/s/ Celine J. Crowson

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Counsel for Petitioner

CERTIFICATION OF SERVICE

The undersigned certifies that in accordance with 37 C.F.R. § 42.6(e), the foregoing PETITIONER'S REQUEST FOR ORAL ARGUMENT was served on October 23, 2024 upon the following via electronic mail (as agreed in the Patent Owner's Mandatory Notice):

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Date: October 23, 2024

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