IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROCHIP TECHNOLOGY INC.,
Petitioner,

v.

APTIV TECHNOLOGIES AG AND APTIV TECHNOLOGIES LIMITED,
Patent Owners.

Case No. IPR2024-00229
U.S. Patent No. 9,645,962

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Board's Scheduling Order dated July 15, 2024, (Paper 13), Microchip Technology Inc. ("Petitioner"), respectfully requests oral argument.

Petitioner requests oral argument on the following issues:

1. All ground(s) on which trial was instituted, including all issues raised by the parties' papers;
2. Rebuttal to Patent Owner's presentation, including any secondary considerations of nonobviousness; and
3. Any other issue(s) the Board deems necessary or appropriate for issuing a final written decision, including any motions that remain pending.[1]

On February 25, 2025, Petitioner's and Patent Owner's counsel met and conferred regarding the location, length, and format of the hearing, including holding a consolidated hearing in IPR2024-00228, IPR2024-00229, IPR2024-00230, PGR2024-00011, and IPR2024-00495. Given the similarities of the Challenged Patents (all of which are from the same family) and the number of overlapping issues, Petitioner and Patent Owner agreed that a consolidated hearing held on a single day would be the most efficient way to proceed.

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[1] There is currently one motion pending: Patent Owner's Motion to Strike (Paper 34).

The table below shows the current hearing dates set by the respective scheduling orders for the five proceedings:

Case No.	Patent	Current Hearing Date
IPR2024-00228	9,619,420	April 16, 2025
IPR2024-00229	9,645,962	April 16, 2025
IPR2024-00230	11,176,072	April 17, 2025
PGR2024-00011	11,681,643	April 17, 2025
IPR2024-00495	9,619,420	May 28, 2025[2]

Rather than hold 5 separate hearings with, *e.g.*, one hour of oral argument per side for each hearing (which would amount to 10 hours of total argument time), Petitioner respectfully requests that the Board hold a consolidated hearing with 2 hours 15 minutes of oral argument per side, inclusive of any rebuttal. Petitioner proposes allocating 75 minutes per side to address issues common to all 5 proceedings, followed roughly 15 minutes of argument per side for each proceeding to address matters specific to that proceeding (*e.g.*, dependent claims, §112 issues, etc.).

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[2] While the current hearing date for IPR2024-00495 is delayed relative to the other proceedings, including it as part of a consolidated hearing would be more efficient because it concerns the same patent as IPR2024-00228.

Petitioner requests that the hearing to take place in-person at a location of the U.S. Patent and Trademark Office on April 16 or shortly thereafter. Petitioner also requests permission to use a computer, projector, and screen to display demonstratives and exhibits, and further requests that the attorneys at Petitioner's counsel table be allowed to use computers. In the event that the Board grants a remote hearing, Petitioner requests permission to use the screen-sharing feature of Zoom (or equivalent) to display demonstratives and exhibits.

Patent Owner indicated that it intends to request 90 minutes of argument per side with no allocation of time for individual proceedings.

Petitioner believes its proposal would provide the Board a more productive presentation to distill the issues and a more equitable approach to ensure neither party concentrates all (or most) of their time on just one proceeding which could disadvantage the opposing party.

Notwithstanding the presence of some common issues, there are also issues unique to each proceeding across the 55 claims being challenged (*e.g.*, PGR2024-00011 is a *post-grant review* that raises various §112 arguments, IPR2024-00229 concerns a continuation-in-part patent with claims that have a later priority date and involve prior art not present in any other proceeding, several patents have dependent claims that Patent Owner has separately argued, etc.). As such, regardless of the precise format of the argument, Petitioner believes that 2 hours 15 minutes is

warranted.

If helpful, Petitioner is available at the Board's convenience to discuss the scheduling and format of the oral argument.

Respectfully submitted,

Dated: March 3, 2025

/Travis Jensen/
Travis Jensen, Reg. No. 60,087

CERTIFICATE OF SERVICE

The undersigned certifies that on March 3, 2025, a copy of the following was served in its entirety via electronic mail, upon the following attorneys of record for the Patent Owner:

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