

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**DBR FINANCE, INC.,
Petitioner,**

v.

**RUGGED CROSS HUNTING BLINDS, LLC,
Patent Owner**

**Case IPR 2024-00291
Patent 11,399,535
Issue Date: August 2, 2022**

Title: CAMOUFLAGE MATERIAL, FOR A HUNTING BLIND

**PATENT OWNER, RUGGED CROSS HUNTING BLINDS, LLC'S
REQUEST FOR ORAL ARGUMENT**

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Attorneys for Patent Owner

Pursuant to 37 C.F.R. § 42.70(a) and this Board's Scheduling Order (Paper 14), Patent Owner, Rugged Cross Hunting Blinds, LLC ("Patent Owner"), respectfully requests an oral hearing in this matter to be held in-person in Alexandria, Virginia, rather than being held by videoconference. Oral argument is scheduled for March 14, 2025 (Due Date 8).

Patent Owner requests sixty (60) minutes of argument per side to address the following issues, or half of the time that the Board determines is appropriate for oral argument. Patent Owner expressly reserves the right to use a portion of its time for rebuttal:

1. The patentability of challenged claims in IPR2024-00291 for all grounds asserted in the Petition for *Inter Partes Review* and any issue addressed or raised in the Board's Institution Decision (Paper 13), instituting review on all claims and grounds presented in the Petition;
2. Any issues raised by Petitioner's papers, including but not limited to the Petition and Petitioner's Reply Brief and exhibits cited therein;
3. Any issues raised by Patent Owner in its Response and exhibits attached thereto.
4. Any issues raised by Petitioner in its Reply and exhibits attached thereto.

5. Any issues raised by Patent Owner in its Sur-reply and exhibits attached thereto
6. Any other relevant issue raised in papers filed in this proceeding including issues raised in papers yet to be filed;
7. Any issues raised by Petitioner in its request for oral argument or otherwise presented by the Petitioner;
8. Any issues raised by the Board or Petitioner at oral argument; and
9. Any additional issues on which the Board seeks clarification or issues deemed necessary for issuing a final written decision.

Patent Owner additionally requests that the Board provide audio-visual equipment to display demonstrative exhibits, including the use of a monitor or projector to be connected to a laptop and screen for a PowerPoint presentation and/or display of documents of record.

DATED this 29 day of January, 2025.

Respectfully submitted,
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By: /s/ Robert L. Wolter
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Patent Owner, Rugged Cross Hunting Blinds, LLC's Request for Oral Argument was served via electronic mail to: Thomas G. Eschweiler, Esq. (teschweiler@epiplaw.com), Eschweiler & Potashnik, LLC, 195 S. Main St., Ste 400, Akron, OH 44308 and Dennis J. Abdelnour, Esq. (dabdelnour@honigman.com), Honigman LLP, 155 N. Wacker Drive, Ste 3100, Chicago, IL 60606, this 29th day of January, 2025.

/s/ Robert L. Wolter
Attorney