

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SCOUT ENERGY MANAGEMENT, LLC, and
CHEVRON U.S.A. INC.
Petitioners

v.

PILOT INTELLECTUAL PROPERTY, LLC,
Patent Owner

IPR2024-00385
Patent No. 8,505,332

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order, Petitioners Scout Energy Management, LLC and Chevron U.S.A. Inc. respectfully submit this Request for Oral Argument. Petitioners specify the following issues to be argued:

- Whether claim 1 of U.S. Pat. No. 8,505,332 ("332 Patent") is unpatentable under 35 U.S.C. § 103 as obvious over Reducing Carbon Dioxide Emissions with Enhanced Oil Recovery Projects: A Life Cycle Assessment Approach ("Aycaguer").
- Whether claim 1 of the '332 Patent is unpatentable under 35 U.S.C. § 103 as obvious over Aycaguer in view of U.S. Patent No. 4,474,591 ("Arand").
- Whether claims 1–4, 6, & 7 of the '332 Patent are unpatentable under 35 U.S.C. § 103 as obvious over Aycaguer in view of U.S. Patent No. 4,976,849 ("Soldati").
- Whether claim 2 of the '332 Patent is unpatentable under 35 U.S.C. § 103 as obvious over Aycaguer in view of Soldati and CO2 Recovery by the Ryan/Holmes Process ("Ryan").
- Whether claims 1–4, 6, & 7 of the '332 Patent are unpatentable under 35 U.S.C. § 103 as obvious over Aycaguer in view of Soldati and Arand.
- Whether claim 2 of the '332 Patent is unpatentable under 35 U.S.C. § 103 as obvious over Aycaguer in view of Soldati, Arand, and Ryan.
- Any other issue raised by the parties' papers.
- Any issue raised on any motion to exclude.
- Any objections to demonstrative exhibits.
- Any other issue the Board deems necessary for issuing a final written decision.

Petitioners respectfully request a 90 minute hearing and that the Board allocate 45 minutes to Petitioners to address the issues identified above.

Furthermore, Petitioners request that the hearing be held in person at the USPTO headquarters in Alexandria.

Petitioners anticipate that more than five (5) individuals will attend the argument on its behalf.

Petitioners further request the ability to use audio/visual equipment, including a laptop, projector, and screen, to display demonstratives and exhibits at the Oral Argument.

Date: March 28, 2025

Respectfully submitted,

By: /Brian W. Oaks/
Brian W. Oaks (Reg. No. 44,981)

MCDERMOTT WILL & EMERY LLP
303 Colorado Street, Suite 2200
Austin, TX 78701
TEL: 512-726-2600
FAX: 512-532-0002
boaks@mwe.com

Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

In accordance with 37 C.F.R. § 42.6(e), the undersigned certifies that on the 28th day of March, 2025, a complete and entire copy of the foregoing **PETITIONERS' REQUEST FOR ORAL ARGUMENT** was served on Patent Owner via email to counsel of record for the Patent Owner at the following addresses:

CRogers@conleyrose.com

TWarden@conleyrose.com

Date: March 28, 2025

Respectfully submitted,

By: /Brian W. Oaks/
Brian W. Oaks (Reg. No. 44,981)

MCDERMOTT WILL & EMERY LLP
303 Colorado Street, Suite 2200
Austin, TX 78701
TEL: 512-726-2600
FAX: 512-532-0002
boaks@mwe.com

Lead Counsel for Petitioners