

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.

Case IPR2024-00385
Patent 8,505,332 B1

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order, Patent Owner Pilot Intellectual Property, LLC respectfully submits this Request for Oral Argument. Patent Owner specifies 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 in any Motion to Strike.
- Any issue raised in any Motion to Exclude.
- Any objections to demonstrative exhibits.

- Any other issue the Board deems necessary for issuing a Final Written Decision.

Patent Owner respectfully requests a 90-minute hearing and that the Board allocate 45 minutes to Patent Owner to address the issues identified above. Furthermore, Patent Owner requests that the hearing be held in person at the USPTO headquarters in Alexandria, Virginia.

Patent Owner anticipates that up to five (5) individuals will attend the argument on its behalf.

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

Respectfully submitted this 28th day of March, 2025.

/Charles J. Rogers/
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e), I hereby certify that on March 28, 2025 the foregoing *Patent Owner's Request for Oral Argument* is being served electronically by agreement of the parties, by e-mail to the following counsel of record.

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