UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,

Petitioner

v.

GRAPHITE CHARGING COMPANY, LLC,

Patent Owner

Case No. IPR2024-00388

U.S. Patent No. 8,291,243

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via P-TACTS

Pursuant to 37 C.F.R. § 42.70, Patent Owner Graphite Charging Company, LLC ("Patent Owner" or "Graphite") respectfully requests oral argument on issues related to the instituted grounds and on any issues raised in any pending motions or briefing filed by the parties. The scheduling order sets oral argument for May 28, 2025. (Paper No. 16 at 11.)

Patent Owner requests (without any intent to waive considerations of any issue not requested) to address the following issues at the oral hearing:

- Petitioner's assertion that claims 1-20 are unpatentable under 35 U.S.C. § 103 as obvious over Wang;
- Petitioner's assertion that claims 2, 12-14, and 20 are unpatentable under 35 U.S.C. § 103 as obvious over Wang in view of AESO Report;
- Petitioner's assertion that claims 1, 3, 11, 15, and 18 are unpatentable under 35 U.S.C. § 102 as anticipated by Cooley;
- Petitioner's expert's conflict of interest because of his connections with Tesla;
- Claim interpretations, level of skill in the art, and any other subsidiary issues relevant to the issues above;
- Any motions to exclude evidence or to strike filed by Patent Owner or Petitioner;
- Any issues specified by Petitioner in its request for oral argument or raised by Petitioner during oral argument; and

- Any other issues the Board deems necessary for issuing a final written decision.

Patent Owner respectfully requests that the Board schedule a video hearing for this proceeding.

Patent Owner will provide Petitioner and the Board with an electronic binder containing the demonstrative exhibits. Patent Owner requests that the Board grant each side 45 minutes of oral argument. Patent Owner requests the ability to reserve a portion of its total time for presenting sur-rebuttal arguments after Petitioner's rebuttal arguments.

This Request is timely, being filed on April 15, 2025. (*See* Paper 16 at 11.)

Respectfully submitted,

Dated: April 15, 2025

/*Jason M. Shapiro*/

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CERTIFICATE OF SERVICE

The undersigned certifies that on April 15, 2025, pursuant to 37 C.F.R. § 42.6(e), a copy of **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served via email (as consented to by counsel) to counsel of record for Petitioner as follows:

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