UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FLUIDMASTER, INC.
Petitioner

v.

DANCO, INC.
Patent Owner

Case No. IPR2024-00634
U.S. Patent No. 9,103,105 B1

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper 20), Patent Owner Danco, Inc. ("Patent Owner") hereby requests oral argument on issues related to the patentability of the challenged claims of U.S. Patent No. 9,103,105, as set forth in more detail below, at a time set by the Board.

Without intending to waive any issue not specifically identified, Patent Owner wishes to present arguments on the following issues:

- Grounds at issue in this proceeding, including all issues raised by the parties relating to the grounds in this proceeding (Grounds 1–5);
- Any issues addressed in Patent Owner's papers, including but not limited to Patent Owner's Response and Patent Owner's Sur-Reply;
- Rebuttal to Petitioner's presentation and positions on all issues, including the issues listed above and any issues raised in Petitioner's papers, including the Petition and Petitioner's Reply, or elsewhere in the record for this proceeding;
- Any motions to exclude filed by any party, including any procedural and evidentiary issues raised by either party; and
- Any other issues the Board deems necessary for issuing a final written decision.

Patent Owner notes that IPR 2024-00633 concerning U.S. Patent No. 9,139,993, IPR2024-00634 concerning U.S. Patent No. 9,103,105, and IPR2024-

00635 concerning U.S. Patent No. 10,934,698 are closely related because all three patents share a common specification. Further, the date of oral argument in each proceeding is currently set for June 10, 2025. *See* IPR2024-00633, Paper No. 33; IPR2024-00634, Paper No. 35; IPR2024-00635, Paper No. 33. However, it is presently unclear whether the Board intends to consolidate oral argument in these three proceedings. If oral argument is not presently consolidated, Patent Owner respectfully requests that a single, consolidated hearing be held in these three proceedings on June 10, 2025, as this would be the most efficient.

Patent Owner requests an in-person hearing at the USPTO headquarters in Alexandria, Virginia. Patent Owner requests no more than sixty (60) minutes per side to present arguments, inclusive of any time reserved for rebuttal or sur-rebuttal. Patent Owner also respectfully requests the ability to use audio-visual equipment to display demonstrative exhibits, including the use of a computer, a projector, a digital projector / document camera ("Elmo"), and a screen.

Dated: April 30, 2025

Respectfully submitted,

/s/ Jason M. Perilla
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Lead Counsel for Patent Owner Danco, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served electronically via e-mail on April 30, 2025, in its entirety on the following counsel of record for Petitioner:

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