

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NEURENT MEDICAL INC. & NEURENT MEDICAL LTD.,
Petitioner,

v.

THE FOUNDRY, LLC,
Patent Owner.

IPR2024-00669
U.S. Pat. No. 11,679,077

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order (Paper 10), Patent Owner respectfully requests oral argument on issues to the patentability of the challenged claims 1-8 and 11 of U.S. Patent No. 11,679,077 (“’077 patent”). The Board has scheduled the oral argument for April 29, 2025, in this IPR as well as in related IPR Nos. 2024-00279 (U.S. Patent No. 10,610,675) and 2024-00280 (U.S. Patent No. 10,894,011) (collectively, the “Foundry IPRs”). Patent Owner and Petitioner jointly request that oral argument be conducted in-person for the Foundry IPRs at the USPTO’s headquarters in Alexandria, VA, and that each party be given ninety (90) minutes of time for its respective presentation for the Foundry IPRs, inclusively if any time reserved for rebuttal. As it relates to the ’077 patent IPR, Patent Owner seeks to address the following issues at oral argument, without intent to waive consideration of any issues not requested to be argued in this proceeding:

- 1) Whether the Petition fails to establish that the challenged claims of the ’077 patent are unpatentable based on the alleged Grounds;
- 2) Any timely-filed motion to exclude;
- 3) Procedural, evidentiary, or other issues raised by the parties or the Board in this proceeding;
- 4) Rebuttal to all issues and/or arguments raised by the Petitioner; and
- 5) Any responses to issues raised by the Board at the hearing.

Dated: March 11, 2025

Respectfully submitted:

/ Heath J. Briggs /

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served on March 11, 2025 via email directed to counsel of record for Petitioner at listed below:

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