

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SALVACION USA, INC.,
Petitioner,

v.

TRUTEK CORP.,
Patent Owner

U.S. Patent No. 8,163,802
Issued: April 24, 2012

Title: ELECTROSTATICALLY CHARGED MULTI-ACTING NASAL
APPLICATION, PRODUCT, AND METHOD

Inter Partes Review No. IPR2024-00711

**PETITIONER'S RESPONSE TO
PATENT OWNER'S REQUEST
FOR ORAL ARGUMENT**

Petitioner, Salvacion USA, Inc., hereby responds to the Request for Oral Argument submitted by Patent Owner, Trutek Corp.

Petitioner has not yet determined whether to request that oral argument be set, but reserves the right to submit a request by DUE DATE 4 (July 29, 2025) as set forth in the Scheduling Order (Paper 8). In the event that the Board decides before DUE DATE 4 to set oral argument, Petitioner currently believes that the argument should address the following issues:

1. Whether Petitioner has established by a preponderance of the evidence that claims 1-3 and 8 of the '802 Patent are unpatentable as anticipated or obvious as argued in Grounds 1-4 in the Petition.
2. Whether Petitioner has established by a preponderance of the evidence that claim 3 of the '802 Patent is unpatentable as obvious as argued in Ground 5 in the Petition.
3. To the extent that Patent Owner's Exhibits 2003-2007 are neither stricken nor excluded, whether Patent Owner's evidence of non-obviousness is sufficient to overcome Petitioner's *prima facie* showing of obviousness.
4. Any other issues raised by the parties in this proceeding or which the Board wishes to address.

Petitioner does not join in Patent Owner's request that the hearing be in person. Further, Petitioner disagrees with Patent Owner's request that each party be

allowed 120 minutes to present its argument. Petitioner believes that, if oral argument is set, the ordinary time allotment of one hour per side would be sufficient.

Respectfully submitted,

Dated: July 15, 2025

/s/William H. Oldach III

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the above-captioned “Petitioner’s Response to Patent Owner’s Request for Oral Argument” was served on July 15, 2025, upon the following via email:

uspto@patentsgroup.com
shk@shk-dplc.com

As well as a courtesy copy to the patent owner’s litigation counsel, by email:

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VORYS, SATER, SEYMOUR AND PEASE LLP

/s/ William H. Oldach III
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