

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GODBERSEN-SMITH CONSTRUCTION COMPANY
d/b/a GOMACO CORPORATION,
Petitioner,

v.

GUNTERT & ZIMMERMAN CONST. DIV., INC.,
Patent Owner.

Case IPR2024-00835
U.S. Patent No. 11,535,318

PATENT OWNER'S REQUEST FOR ORAL HEARING

Pursuant to 37 C.F.R. § 42.70(a), Patent Owner, Guntert & Zimmerman Const. Div., Inc. ("Patent Owner"), requests the opportunity to present oral argument in this matter. The oral argument is presently scheduled for August 20, 2025. Paper 10 at 11. The parties have met and conferred and Patent Owner prefers an in-person hearing with each side allowed a total of 45 minutes for arguments, with the opportunity to reserve a portion of that time for rebuttal.

The issues to be argued with respect to IPR2024-00835 include the following:

1. Whether claims 1-8 are patentable over CIII and Rio (Ground 1);
2. Whether claims 2-7 are patentable over CIII, Rio, and Smolders (Ground 2);
3. Any claim construction disputes raised by the parties;
4. Patent Owner's and Petitioner's Motions to Exclude Evidence, if any;
5. Any additional issues on which the Board seeks clarification; and
6. Rebuttal of any arguments made by Petitioner.

Petitioner is the party with the burden of proof and will present first at the oral hearing. Patent Owner will address any issues raised by Petitioner, or questions raised by the Board during presentation. Patent Owner also respectfully reserves the right to supplement and/or amend the foregoing statement of issues to the extent the Rules permit.

Patent Owner's Request for Oral Hearing
IPR2024-00835 (U.S. Patent No. 11,535,318)

Dated: July 9, 2025

Respectfully submitted,

/James Hannah/

James Hannah (Reg. No. 56,369)
Herbert Smith Freehills Kramer (US) LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
James.Hannah@hsfkramer.com

Jeffrey H. Price (Reg. No. 69,141)
Jenna Fuller (Reg. No. 74,212)
Herbert Smith Freehills Kramer (US) LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-7502
Facsimile: (212) 715-8302
Jeffrey.Price@hsfkramer.com
Jenna.Fuller@hsfkramer.com

(Case No. IPR2024-00835)

Attorneys for Patent Owner
Guntert & Zimmerman Const. Div., Inc

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, that service was made on the Petitioner as detailed below.

<i>Date of service</i>	July 9, 2025
<i>Manner of service</i>	Electronic Filing with the Board
<i>Documents served</i>	PATENT OWNER'S REQUEST FOR ORAL HEARING
<i>Persons Served</i>	Finnegan, Henderson, Farabow, Garrett & Dunner, LLP: Jason E. Stach Luke J. McCammon David K. Mroz Sonja W. Sahlsten Robert K. High

/James Hannah/
James Hannah
Registration No. 56,369
Lead Counsel for Patent Owner