

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SMAXTEC INC. and
SMAXTEC ANIMAL CARE GMBH,
Petitioners,

v.

ST REPRODUCTIVE TECHNOLOGIES, LLC,
Patent Owner.

Case No. IPR2024-00885
U.S. Patent No. 8,823,515

**PETITIONERS' AND PATENT OWNER'S
JOINT REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a), Petitioners smaXtec Inc. and smaXtec Animal Care GmbH (“Petitioners”) and Patent Owner ST Reproductive Technologies, LLC (“Patent Owner”) (collectively, the “Parties”) hereby jointly request oral argument in the present *inter partes* review (“IPR”) proceeding.

Currently, oral argument is scheduled for September 9, 2025, in two related IPR proceedings between Petitioners and Patent Owner: IPR2024-00875 and IPR2024-00885. The Parties propose a joint oral argument for the two proceedings, with each side allotted 60 minutes for argument. The Parties further request that the oral argument take place in person at the USPTO headquarters in Alexandria, Virginia.

With respect to the above-captioned proceeding (IPR2024-00885), the Parties specify the following issues to be argued:

- Whether claims 1–2 of U.S. Patent No. 8,823,515 (“the ’515 patent”) are unpatentable as anticipated by Trevarthen, *The Importance of Utilising Electronic Identification for Total Farm Management: A Case Study of Dairy Farms on the South Coast of NSW* (Oct. 24, 2005) (“Trevarthen”);
- Whether claims 1–2 of the ’515 patent are unpatentable as obvious over Trevarthen;
- Whether claims 3–4 of the ’515 patent are unpatentable as obvious over Trevarthen and U.S. Patent No. 6,059,733 (“Brune”);

- Whether claims 15–25 of the ’515 patent are unpatentable as obvious over Trevarthen and U.S. Patent Pub. No. 2006/0161443 (“Rollins”);
- Whether Trevarthen was publicly accessible at the time of the invention;
- Whether claims 1–2 of the ’515 patent are unpatentable as obvious over U.S. Patent No. 7,059,275 (“Laitinen”), International Patent Pub. No. WO 2006/059916 (“Buchanan”), and International Patent Pub. No. WO 2007/089184 (“Liao”);
- Whether claims 3–4 of the ’515 patent are unpatentable as obvious over Laitinen, Buchanan, Liao, and Brune;
- Whether claims 15–25 of the ’515 patent are unpatentable as obvious over Laitinen, Buchanan, Liao, and Rollins;
- Responses to the Parties’ presentations on all matters;
- Any other issue briefed or presented by the Parties throughout this trial; and
- Any other issues that the Board deems necessary for issuing a final written decision.

DATED: July 11, 2025

Respectfully Submitted,

/Brian M. Buroker/

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CERTIFICATE OF SERVICE

A copy of the foregoing document was served via electronic mail on Patent Owner's counsel of record at the email addresses dmoftett@akingump.com, mmahoney@akingump.com, twlanders@akingump.com, jhernandez@akingump.com, and AG-ST-SMAXTEC@akingump.com, as indicated in Patent Owner's Amended Mandatory Notices, dated October 16, 2024.

DATED: July 11, 2025

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