

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MOBILEYE GLOBAL, INC., and
ZF ACTIVE SAFETY AND ELECTRONICS US LLC¹

Petitioners

v.

FACET TECHNOLOGY CORP.,
Patent Owner

Inter Partes Review No. IPR2024-01111
U.S. Patent No. 9,671,328

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

¹ ZF Active Safety and Electronics US LLC, which filed a petition in IPR2025-00749, has been joined as a petitioner in this proceeding.

REQUEST FOR ORAL ARGUMENT

Patent Owner hereby requests an in-person oral hearing pursuant to 37 C.F.R. § 42.70. The Board has scheduled the oral hearing for December 5, 2025. Patent Owner requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen for a PowerPoint presentation. Patent Owner further requests that each party be given sixty (60) minutes of time for its respective presentation, inclusive of any time reserved for rebuttal. To the extent that the Board schedules argument in this IPR and IPR2024-01110 to less than a total of 120 minutes per side, Patent Owner request that argument be consolidated such that the parties may split their time as they deem appropriate between the two IPRs.

Pursuant to the Board's July 23, 2025 Notice of Return to In-person PTAB Hearings, Patent Owner requests the oral argument be held at the USPTO Southwest Regional Office at 207 S. Houston Street, Suite 159, Dallas, Texas. Patent Owner requests that the oral hearing be held at that location to accommodate counsel's travel schedule from depositions scheduled in another matter the same week in Austin, Texas.

ISSUES TO BE ARGUED:

- 1) The appropriate construction of "configured to detect objects of interest within the field of view and for each object of interest ... determine whether

the object of interest includes a reflective surface [and] ... determine whether the reflective surface is a road marker” as recited in claim 1 of U.S. Patent No. 9,671,328 (“the ’328 Patent”);

- 2) The appropriate construction of “configured to detect objects of interest within the field of view and for each object of interest: determine whether the object of interest includes at least one light intensity value associated with a reflective surface of a road marker in the field of view” as recited in claim 9 of the ’328 Patent;
- 3) Whether Petitioner has failed to meet its burden of proving that the combination of Gallagher and Schofield renders obvious any of claims 1-4 or 8-13 of the ’328 Patent;
- 4) Whether Petitioner has failed to meet its burden of proving that the combination of Gallagher, Schofield, and Frank renders obvious any of claims 15-16 of the ’328 Patent;
- 5) Whether Petitioner has failed to meet its burden of proving that the combination of Gallagher, Schofield, Frank, and ASTM renders obvious claim 14 of the ’328 Patent;

- 6) Whether Petitioner has failed to meet its burden of proving that the combination of Gallagher, Schofield, Leonard, and Popovich renders obvious any of claims 5-7 of the '328 Patent;
- 7) Whether Petitioner has failed to meet its burden of proving that any of challenged claims 1-16 of the '328 Patent are unpatentable;
- 8) Any issues addressed in Patent Owner's papers, including but not limited to, the Patent Owner's Response and Patent Owner's Sur-Reply;
- 9) Any motions to exclude or any other motions that remain pending at the time of the hearing;
- 10) Any issues specified by Petitioner in its Request for Oral Argument;
- 11) Rebuttal to all issues and/or arguments raised by Petitioner; and
- 12) Any responses to issues raised by the Board at or before the hearing.

Dated: October 22, 2025

Respectfully submitted,

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Certificate of Service 37 C.F.R. § 42.6(e)

The undersigned certifies that on October 22, 2025, I will cause true and correct copies of the foregoing Patent Owner's Request for Oral Argument to be served electronically upon the following attorneys who have consented to service via email. Pet. at 58.

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