

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORP. AND KIA CORPORATION,
Petitioners,

v.

EMERGING AUTOMOTIVE LLC,
Patent Owner

Case IPR2024-01167
U.S. Patent No. 11,738,659

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's January 27, 2025, Scheduling Order, Patent Owner Emerging Automotive LLC respectfully requests oral argument, currently scheduled for October 29, 2025. Patent Owner requests one hour in which to present its arguments. Under 37 C.F.R. § 42.70, and without intending to waive any issue not specifically identified, Patent Owner specifies the following issues to be argued:

1. Whether claims 1, 3-21 of U.S. Patent No. 11,738,659 (the "'659 patent") are patentable under 35 U.S.C. § 103 over Kleve and Hatton;
2. Whether claim 2 of the '659 patent is patentable under 35 U.S.C. § 103 over Kleve, Hatton and Sekiyama;
3. Whether claims 1-3, 5, 8-10 of the '659 patent are patentable under 35 U.S.C. § 103 over Mikan;
4. Whether claims 4, 11-18, 20, 21 of the '659 patent are patentable under 35 U.S.C. § 103 over Mikan and Xiao;
5. Whether claims 6, 7 of the '659 patent are patentable under 35 U.S.C. § 103 over Mikan and Sekiyama;
6. Whether claim 19 of the '659 patent is patentable under 35 U.S.C. § 103 over Mikan, Xiao, and Sekiyama;
7. Any issues specified by Petitioners in their Request for Oral Argument;
and
8. Any other issues the Board deems necessary for issuing a final written

decision (e.g., any motion to exclude evidence and any motion to seal evidence).

Patent Owner is currently unaware of any good cause that exists to appear virtually.

Dated: September 17, 2025

/Jerry D. Tice II/

Jerry D. Tice II

Reg. No. 73,582 (Lead counsel)

Aaron R. Hand

Reg. No. 80,694 (Back-up counsel)

Brenda Entzminger

Reg. No. 76,896 (Back-up counsel)

BUNSOW DE MORY LLP

701 El Camino Real

Redwood City, CA 94063

Telephone: 650-318-6774

Facsimile: 415-426-4744

jtice@bdiplaw.com

Counsel for Patent Owner

CERTIFICATE OF SERVICE

Petitioners have consented to e-mail service in this proceeding. Pursuant to 37 C.F.R. §42.6, the undersigned certifies that on September 17, 2025, a copy of the foregoing document was served by email upon the following counsel at the below email addresses:

Finnegan, Henderson, Farabow, Garrett & Dunner LLP
Joshua L. Goldberg – joshua.goldberg@finnegan.com
James R. Barney - james.barney@finnegan.com
Aidan Skoyles - aidan.skoyles@finnegan.com
Nicholas Eitsert - nicholas.eitsert@finnegan.com

QUINN EMANUEL URQUHART & SULLIVAN, LLP
James M. Glass – jimglass@quinnemanuel.com
Quincy Lu - quincylu@quinnemanuel.com
Ron Hagiz - ronhagiz@quinnemanuel.com
Jeffrey S. Gerchick - jeffgerchick@quinnemanuel.com
Brett Watkins - brettwatkins@quinnemanuel.com

Dated: September 17, 2025

/Jerry D. Tice II/
Jerry D. Tice II
Reg. No. 73,582 (Lead counsel)
BUNSOW DE MORY LLP
701 El Camino Real
Redwood City, CA 94063
Telephone: 650-318-6774
Facsimile: 415-426-4744
jtice@bdiplaw.com

Counsel for Patent Owner