

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LEDUP MANUFACTURING GROUP LTD.,
Petitioner,

v.

SEASONAL SPECIALTIES, LLC,
Patent Owner.

Case IPR2024-01259
U.S. Patent No. 11,533,794

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to the Board's February 20, 2025 Scheduling Orders (Paper 15), Petitioner LEDUp Manufacturing Group Ltd. ("Petitioner"), respectfully requests oral argument, currently scheduled for November 19, 2025. Counsel for Petitioner has met and conferred with counsel for Patent Owner Seasonal Specialties, LLC ("Patent Owner"), and Patent Owner has no objection to a request for a consolidated oral argument for this proceeding and related proceeding IPR2024-01258 (U.S. Patent No. 11,096,252). Accordingly, Petitioner requests a consolidated hearing for this proceeding and related proceeding IPR2024-01258 (U.S. Patent No. 11,096,252). As there are a few limited matters that may differ between the cases, Petitioner requests one hour and fifteen minutes in which to present its arguments for both cases, subject to any additional time allowed for participation in the LEAP program. Under 37 C.F.R. § 42.70, and without intending to waive any issue not specifically identified, Petitioner specifies the following issues to be argued:

1. The unpatentability of claim 1 of U.S. Patent No. 11,533,794 under 35 U.S.C. § 102 over Inoue;
2. The unpatentability of claims 1, 10 and 15 of U.S. Patent No. 11,533,794, under 35 U.S.C. § 103 over Inoue in view of Holler;
3. The unpatentability of claims 1, 10, 11 and 15 of U.S. Patent No. 11,533,794 under 35 U.S.C. § 103 over Holler in view of Smith;

4. The unpatentability of claims 1, 5-7, and 9 of U.S. Patent No. 11,533,794 under 35 U.S.C. § 103 over Fisherman in view of Callahan;
5. The unpatentability of claims 2-6, 8 and 9 of U.S. Patent No. 11,533,794 under 35 U.S.C. § 103 over Inoue in view of Smith;
6. The unpatentability of claims 10-14 of U.S. Patent No. 11,533,794 under 35 U.S.C. § 103 over Holler in view of Callahan; and
7. The unpatentability of claims 1, 2, 10 and 15 of U.S. Patent No. 11,533,794 under 35 U.S.C. § 102 over Yu;

The issues for argument for the consolidated case, IPR2024-01258 (U.S. Patent No. 11,096,252), are covered separately in the Petitioner's Request for Oral Argument regarding that case.

Petitioner also requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector and screen for displaying documents from a computer.

Further, Petitioner requests that the hearing be held at the USPTO's Alexandria, Virginia office as provided in the Scheduling Order. Paper 15, 7.

Respectfully submitted,

Cochran Freund & Young LLC

A handwritten signature in black ink, reading "Christopher P. Whitham". The signature is fluid and cursive, with the first name "Christopher" being more prominent and the last name "Whitham" following in a similar style.

Christopher P. Whitham
Registration No. 53,769
Attorney for Petitioner

Date: October 9, 2025

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the above-captioned **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served in its entirety on October 9, 2025, upon the following parties via electronic mail:

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Respectfully submitted,

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