UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner

v.

CHARGE FUSION TECHNOLOGIES, LLC,
Patent Owner

Case No. IPR2025-00032
Patent No. 11,563,338

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's May 19, 2025, Scheduling Order (Paper 12), Petitioner respectfully requests oral argument for the trial currently scheduled on February 18, 2026. The Parties conferred and agreed to a requested forty-five (45) minutes of argument for each Party for this IPR2025-00032 and an in-person hearing at the USPTO's Alexandria, Virginia location.

Alternatively, there are currently three IPRs pending before this Panel covering related patents. The second two IPRs—IPR2025-000152 on U.S. Patent No. 11,990,788 and IPR2025-00153 on U.S. Patent No. 11,631,987—are currently scheduled for oral argument on April 16, 2026. If convenient for the Board, the Parties jointly agree that a consolidated hearing covering all three related IPR Petitions would be appropriate. Due to Patent Owner's trial conflicts, the Parties propose that a joint hearing be held the week of March 30, 2026, or shortly thereafter. If a joint hearing is held, the Parties propose that argument on the IPR2025-00032 be held first, with each side receiving forty-five (45) minutes of argument. Then, after a short break, the Parties propose a joint hearing be held on the IPR2025-000152 and IPR2025-00153 IPRs with each side receiving thirty (30) total minutes of argument for those two IPRs.

Regarding this IPR2025-00032, pursuant to 37 C.F.R. § 42.70(a), Petitioner requests 45 minutes of total time and specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding:

1. Whether Claims 1-4, 6-7, 9-13, 15-16, 18-22, 24-25, and 27 are obvious over U.S. Patent Application Publication No. 2009/0313034 to Ferro, et al. ("*Ferro*") in view of European Patent Application Publication 1,920,968 to Oyobe, et al. ("*Oyobe*"); U.S. Patent No. 7,124,691 to Donnelly, et al. ("*Donnelly*"); Letendre, S.E. and Kempton, W. The V2G Concept: A New Model for Power? Public Util. Fortn. February 2002, 140, pp. 16-26. ("*Letendre*"); U.S. Patent No. 6,889,762 to Zeigler, et al. ("*Zeigler*"); and U.S. Patent Application Publication No. 2009/0130965 to Galvez-Ramos ("*Galvez-Ramos*");

2. Whether Claims 5, 8, 14, 17, 23, and 26 are obvious over *Ferro* in view of *Oyobe, Donnelly, Letendre, Zeigler, Galvez-Ramos*, and U.S. Patent No. 6,622,083 to Knockeart et al. ("*Knockeart*");

3. Whether Claims 28-29 are obvious over *Ferro* in view of *Donnelly, Letendre*, and U.S. Patent Publication No. 2008/0136371 to Sutardja ("*Sutardja*");

4. Any claim constructions raised in any papers filed in the proceeding;

5. Any issues specified in the Patent Owner's Preliminary Response, Petitioner's Reply to Patent Owner's Preliminary Response; Patent Owner's Sur-Reply to Petitioner's Reply to Patent Owner's Preliminary Response; Patent Owner's Response; Petitioner's Reply; Patent Owner's Sur-Reply; or Patent Owner's Request for Oral Argument; and

6. Any issues regarding motions to exclude or motions to strike that may be filed or pending; and

7. Any issues otherwise raised by the Board.

Respectfully submitted,

ERISE IP, P.A.

BY: /s/ Jennifer C. Bailey

Jennifer C. Bailey Reg. No. 52,583
7015 College Blvd., Suite 700
Overland Park, KS 66211
P: (913) 777-5600
F: (913) 777-5601
jennifer.bailey@eriseip.com

COUNSEL FOR PETITIONER TESLA, INC.

CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.6

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on January 7, 2026, the foregoing *Petitioner's Request for Oral Argument* was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

Frederick A. Tecce (Fred.tecce@altimaadvisors.com)
Bradley D. Liddle (bliddle@carterarnett.com)
Michael Pomeroy (mpomeroy@carterarnett.com)
Douglas W. Link (dlink@cozen.com)

BY: /s/ Jennifer C. Bailey
Jennifer C. Bailey, Reg. No. 52,583

COUNSEL FOR PETITIONER