

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TESLA, INC.,  
Petitioner,  
v.

CHARGE FUSION TECHNOLOGIES, LLC,  
Patent Owner.

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Case IPR2025-00032  
U.S. Patent 11,563,338

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

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Pursuant to the Board’s May 19, 2025, Scheduling Order (Paper 12), Patent Owner Charge Fusion Technologies, LLC (“Patent Owner”) respectfully requests oral argument for the trial currently scheduled on February 18, 2026. The Parties have conferred and agreed to forty-five (45) minutes of argument per side for IPR2025-00032, with an in-person hearing at the USPTO’s Alexandria, Virginia location.

Alternatively, there are currently three inter partes reviews pending before this Panel involving related patents. In addition to this proceeding, IPR2025-000152 (U.S. Patent No. 11,990,788) and IPR2025-00153 (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 IPRs would be appropriate. As a result of counsel for Patent Owner’s conflicting trial schedule, the Parties propose that a consolidated hearing be held during the week of March 30, 2026, or shortly thereafter.

If a consolidated hearing is held, the Parties propose:

- Argument on IPR2025-00032 be heard first, with forty-five (45) minutes per side; and
- After a short break, a joint hearing on IPR2025-000152 and IPR2025-00153, with thirty (30) total minutes per side allocated to those two proceedings.

## **Issues to Be Addressed**

With respect to IPR2025-00032, and pursuant to 37 C.F.R. § 42.70(a), Patent Owner requests 45 minutes of total argument time and identifies the following issues for oral argument, without intending to waive consideration of any other issue:

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 & Kempton, The V2G Concept: A New Model for Power?, Public Utilities Fortnightly (Feb. 2002); 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 Application Publication No. 2008/0136371 to Sutardja (“Sutardja”);
4. Any claim construction issues raised in the parties’ papers;

5. Any other issues addressed in the Petition, Patent Owner Response, Petitioner Reply, Patent Owner Sur-Reply, Patent Owner's motion practice, or any Petitioner or Patent Owner Request for Oral Argument;
6. Any issues concerning motions to exclude or motions to strike that may be filed; and
7. Any issues otherwise raised by the Board.

Dated: January 7, 2026

Respectfully submitted,

*/Bradley D. Liddle/*

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## **CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2026, a true and correct copy of the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was served by electronic filing and electronic mail upon the following counsel of record for Petitioners:

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