

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.
Petitioner

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner

IPR2025-00220
U.S. Patent No. 11,206,670

PETITIONER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Petitioner Tesla, Inc. ("Petitioner") hereby requests an oral argument in the present *inter partes* review. Per the Board's Scheduling Order, the oral argument is currently scheduled for April 7, 2026. Scheduling Order, Paper 11, p. 12.

Petitioner requests an in-person hearing to be held in a Patent Trial and Appeal Board hearing room located at the United States Patent and Trademark Office headquarters in Alexandria, Virginia. Petitioner has conferred with Patent Owner's counsel and both parties jointly request that the in-person hearing be conducted at the USPTO headquarters in Alexandria. Petitioner requests 60 minutes of oral argument per side and the opportunity to address all issues raised in the papers, including:

- the parties' claim construction positions;
- the obviousness of claims 1 - 18 under 35 U.S.C. § 103 over Wallen in view of Berggren;
- any other issues raised by the parties; and
- any responses to issues raised by the Board or Patent Owner at the oral argument.

Petitioner notes that an oral hearing is also scheduled to occur on April 7, 2026 in IPR2025-00217 (U.S. Patent No. 10,952,153) and IPR2025-00219 (U.S. Patent No. 9,706,500). Petitioner and Patent Owner each requested that the Board conduct

a consolidated oral hearing in IPR2025-00217 and IPR2025-00219. *See* IPR2025-00217, Paper 20 at 1-2, and Paper 21 at 1; IPR2025-00219, Paper 20 at 1-2, and Paper 21 at 1. At this time, the Board has not issued an order setting a consolidated oral argument for IPR2025-00217 and IPR2025-00219. Given the overlap in parties, Petitioner requests that the Board not schedule the oral hearing in this proceeding at the same time as the oral hearing(s) in IPR2025-00217 and IPR2025-00219.

Patent Owner has requested that the Board move the oral argument in this proceeding to a day other than April 7, 2026 (or March 24, 2026). *See* Paper 24 at 1. Petitioner is available for the original April 7, 2026 hearing date, but does not oppose Patent Owner's request. To the extent the Board grants Patent Owner's request and moves the oral argument in this proceeding, Petitioner respectfully requests that the oral argument be set for April 15, 2026 or later (due to various unavailability April 8-14).

If the Board has any questions or comments, the undersigned attorney is available for a telephone conference.

Respectfully submitted,

Dated: 2/23/2026
HAYNES AND BOONE, LLP
2801 N. Harwood St., Suite 2300
Dallas, Texas 75201
Customer No. 27683

/Scott Jarratt/
Scott T. Jarratt
Lead Counsel for Petitioner
Registration No. 70,297

CERTIFICATE OF SERVICE

The undersigned certifies, under 37 C.F.R. § 42.6, that service was made on the Patent Owner as detailed below.

Date of service February 23, 2026

Manner of service Electronic Service by E-mail: BTheiss@vklaw.com; DGolub@vklaw.com; RODonnell@vklaw.com; ELaBarr@vklaw.com; rrigby@intven.com

Documents served **PETITIONER'S REQUEST FOR ORAL ARGUMENT**

Persons served Brandon R. Theiss
Daniel H. Golub
Ryan W. O'Donnell
Edward T. La Barr
VOLPE KOENIG
30 S. 17th Street, Suite 1800
Philadelphia PA 19103

Russell J. Rigby
INTELLECTUAL VENTURES II LLC
3150 139th Avenue Southeast Building 4
Bellevue, WA 98005

/Scott Jarratt/
Scott T. Jarratt
Lead Counsel for Petitioner
Registration No. 70,297