

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,

Petitioner,

v.

INTELLECTUAL VENTURES II LLC,

Patent Owner.

Case No. IPR2025-00222

U.S. Patent No. 9,232,158

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

In accordance with 37 C.F.R. § 42.70(a), Patent Owner hereby requests an oral argument in the present *inter partes* review. Per the Board's Scheduling Order, the oral argument is currently scheduled for March 24, 2026. Scheduling Order, Paper 11, p. 11.

Patent Owner requests a hearing at USPTO Headquarters, Alexandria. 600 Dulany St., Alexandria, Virginia on March 26, 2026. Patent Owner respectfully requests that each side be permitted up to forty-five (45) minutes of argument time with the opportunity to reserve time for rebuttal. To the extent the Board orders a different amount of time for argument, Patent Owner requests that each side be provided an equal amount of time for argument.

Patent Owner requests a projector and screen for computer-generated slides and a document camera/projector to present any demonstrative exhibits. Without waiving consideration of any issue not listed below, the Patent Owner requests the opportunity to address all issues raised in the papers, including:

- how Petitioner has failed to meet its burden with respect to claims 1-2, 4-5, 8-11, 13-16 and 19 under Grounds 1-2 presented in the Petition (Paper 1);
- any issue raised in the Board's Institution Decision (Paper 10);
- any argument raised in the Petition (Paper 1), Patent Owner's Response (Paper 15), Petitioner's Reply (Paper 17), and Patent Owner's Sur-Reply (Paper 18), including the parties' claim construction and prior art arguments;

- Any motions or issues that remain pending at the time of the hearing, including any motions to exclude evidence and responses thereto;
- any issue raised in any paper of record in this proceeding;
- any issue raised by Petitioner in its request for oral argument; and
- any issue raised by the Board during the oral argument.

If the Board has any questions or comments, the undersigned attorney respectfully requests a telephone conference.

Respectfully submitted,

Dated: February 17, 2026

By: /Daniel H. Golub/
Daniel H. Golub
Registration No. 33,701
Counsel for Patent Owner
Intellectual Ventures II LLC

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **PATENT OWNER'S REQUEST FOR ORAL ARGUMENT** was served via email (as consented to by counsel) on February 17, 2026 to lead and backup counsel of record for Petitioner as follows:

Jonathan Bowser
jon.bowser.ipr@haynesboone.com
HAYNES AND BOONE, LLP
2801 N. Harwood Street, Suite 2300
Dallas, TX 75201

David O'Brien
david.obrien.ipr@haynesboone.com
HAYNES AND BOONE, LLP
2801 N. Harwood Street, Suite 2300
Dallas, TX 75201

Scott T. Jarratt
scott.jarratt.ipr@haynesboone.com
HAYNES AND BOONE, LLP
2801 N. Harwood Street, Suite 2300
Dallas, TX 75201

Hong Shi
hong.shi.ipr@haynesboone.com
HAYNES AND BOONE, LLP
2801 N. Harwood Street, Suite 2300
Dallas, TX 75201

Ashraf Fawzy
afawzy@tesla.com
Tesla, Inc.
1 Tesla Road
Austin, TX 78725

Dated: February 17, 2026

By: /Daniel H. Golub/
Daniel H. Golub
Registration No. 33,701
Counsel for Patent Owner
Intellectual Ventures II LLC