

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN TUOZHU TECHNOLOGY CO., LTD.,
Petitioner,

v.

STRATASYS, INC.,
Patent Owner.

Case IPR2025-00311
Patent 8,562,324

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 10), Petitioner submits this Request for Oral Argument on the instituted unpatentability grounds regarding U.S. Patent No. 8,562,324. Petitioner requests an in-person hearing at the USPTO's Alexandria office, and sixty (60) minutes per party of oral argument time. Additionally, IPR Proceeding No. IPR2025-00321 involving the same parties and same PTAB judges is scheduled for oral hearing on the same day as this proceeding. As such, Petitioner respectfully requests a break of at least one hour between the oral hearings for the two proceedings.

At the oral argument, Petitioner requests (without waiving consideration of any issue not listed below) to address the following issues:

1. Whether claims 1, 3, 5-7, 9-10 and 19-22 are unpatentable over Mazumder and Mori, pursuant to 35 U.S.C. §103;
2. Whether claim 4 is unpatentable over Mazumder, Mori and Tian, pursuant to 35 U.S.C. §103;
3. Whether claim 8 is unpatentable over Mazumder, Mori and Hull, pursuant to 35 U.S.C. §103;
4. Whether claim 11 is unpatentable over Mazumder, Mori and Seki, pursuant to 35 U.S.C. §103;
5. Whether claim 17 is unpatentable over Mazumder, Mori and Waehner, pursuant to 35 U.S.C. §103;
6. Whether claim 18 is unpatentable over Mazumder, Mori and Lan, pursuant to 35 U.S.C. §103;
7. Whether claims 20-22 are unpatentable over Mazumder, Mori and Anderson, pursuant to 35 U.S.C. §103;

8. Whether claims 1, 3, 5-7, 9-10 and 19-22 are unpatentable over Kritchman, Tay and Henke, pursuant to 35 U.S.C. §103;
9. Whether claim 4 is unpatentable over over Kritchman, Tay, Henke and Tian, pursuant to 35 U.S.C. §103;
10. Whether claim 8 is unpatentable over Kritchman, Tay, Henke and Hull, pursuant to 35 U.S.C. §103;
11. Whether claim 11 is unpatentable over Kritchman, Tay, Henke and Seki, pursuant to 35 U.S.C. §103;
12. Whether claim 17 is unpatentable over Kritchman, Tay, Henke and Waehner, pursuant to 35 U.S.C. §103;
13. Whether claim 18 is unpatentable over Kritchman, Tay, Henke and Lan, pursuant to 35 U.S.C. §103;
14. Whether claims 3, 5, 9-10 and 20-22 are unpatentable over Kritchman, Tay, Henke and Anderson, pursuant to 35 U.S.C. §103
15. Whether the Mori and Henke references are analogous art to the '324 patent;
16. Any claim construction issues, including whether Elements [1.d] and [19.d] require the claimed “image of the build volume from the video camera” and the claimed “two-dimensional projection of the three-dimensional model from the point of view of the video camera” are required to be displayed simultaneously;
17. Any procedural and/or evidentiary issues;
18. Rebuttal to Patent Owner’s presentation on all matters; and
19. Any additional issues on which the Board seeks clarification.

Petitioner requests the ability to use audio visual equipment to display demonstrative exhibits, including the use of a projector and screen that connects to a laptop computer.

Respectfully submitted,

Dated February 4, 2026

/Patrick J. Bisenius/
Michael T. Hawkins, Reg. No. 57,867
Patrick J. Bisenius, Reg. No. 63,893
Joshua A. Griswold, Reg. No. 46,310
Cameron A. Ubel, Reg. No. 77,081
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on February 4, 2026, a complete and entire copy of this Petitioner's Request for Oral Argument was provided by email, to the Patent Owner by serving the email correspondence address of record as follows:

Brian W. Oaks
Aashish G. Kapadia
Kevin J. Meek
Syed K. Fareed
Christian Tatum
MCDERMOTT WILL & EMERY LLP
300 Colorado Street, Suite 2200
Austin, TX 78701

Email: IPR-Stratasys-MWE@mwe.com

/Diana Bradley/
Diana Bradley
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
bradley@fr.com