

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 IPR2025-00321
Patent 9,421,713

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 11), Petitioner submits this Request for Oral Argument on the instituted unpatentability grounds regarding U.S. Patent No. 9,421,713. Petitioner requests an in-person hearing at the USPTO's Alexandria office, and ninety (90) minutes per party of oral argument time. The longer than normal argument time is requested due to the specific nature and complexity of the issues in this case which include not only issues relating to the application of the cited prior art to the challenged claims but additionally include: (1) alleged earlier date of invention for the claimed subject matter; (2) public availability of the cited prior art publications prior to the priority date of the '713 patent; and (3) claim construction issues. Additionally, IPR Proceeding No. IPR2025-00311 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 1-2, 5-7, 9 and 16-17 are unpatentable over Leavitt, RepRap Article and RepRap Video, pursuant to 35 U.S.C. §103;
2. Whether claims 1-2, 6-7, 9 and 16-17 are unpatentable over Priedeman and KISSlicer, pursuant to 35 U.S.C. §103;

3. Whether claim 5 is unpatentable over Priedeman, KISSlicer, RepRap Article and RepRap Video, pursuant to 35 U.S.C. §103;
4. Whether claims 1-2, 6-7 and 9 are unpatentable over Boyer, pursuant to 35 U.S.C. §102;
5. Claim construction issues, including addressing whether the claimed purge tower is required to have no contact with the claimed part;
6. Whether Patent Owner has established an earlier date of invention for any claims of the '713 patent;
7. Whether the RepRap Article, RepRap Video, and KISSlicer references are prior art to the '713 patent;
8. Any procedural and/or evidentiary issues;
9. Rebuttal to Patent Owner's presentation on all matters; and
10. 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/
Patrick J. Bisenius, Reg. No. 63,893
Michael T. Hawkins, Reg. No. 57,867
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