

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.
Petitioner

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner

IPR2025-00339
U.S. Patent No. 7,916,180

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 23, 2026. Scheduling Order, Paper 14, p. 13.

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 with 60 minutes of oral argument per side, in accordance with the Scheduling Order, which indicates that an in-person hearing may be requested at the USPTO headquarters in Alexandria, Virginia. Scheduling Order, Paper 14, p. 7. 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 the opportunity to address all issues raised in the papers, including:

- the parties’ claim construction arguments;
- the obviousness of claims 1-3, 10-12, 22, 24, 25, 28, 30, 32, and 33 under 35 U.S.C. § 103 over Matsushima and Yu;
- the obviousness of claims 28 and 30 under 35 U.S.C. § 103 over Matsushima, Yu, and Weldy;
- the obviousness of claims 22, 23, 28, 30, and 33 under 35 U.S.C.

§ 103 over Choi, Labaziewicz, and Yu;

- 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 argument is also scheduled to occur on April 23, 2026 in IPR2025-00342 (U.S. Patent No. 7,336,805) involving the same parties in this proceeding. Petitioner requests that the Board schedule the oral argument in this proceeding and the oral argument in IPR2025-00342 to occur sequentially in the same hearing room. The same parties are involved in both oral arguments and the parties' respective lead counsels are the same in both proceedings. Petitioner respectfully suggests that the oral argument in this proceeding be conducted in the morning of April 23, 2026, and the oral argument in IPR2025-00342 be conducted in the afternoon of April 23, 2026.

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

Respectfully submitted,

Dated: March 10, 2026
HAYNES AND BOONE, LLP
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/Jonathan R. Bowser/
Jonathan R. Bowser
Lead Counsel for Petitioner
Registration No. 54,574

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 March 10, 2026

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

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