

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. IPR2025-00339

U.S. Patent No. 7,916,180

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

In accordance with 37 C.F.R. § 42.70(a), Patent Owner hereby requests oral argument in the present *inter partes* review. The oral argument is currently scheduled for April 23, 2026. Scheduling Order, Paper 14, p. 13.

Patent Owner requests a hearing at USPTO Headquarters, Alexandria, 600 Dulany St., Alexandria, Virginia on April 23, 2026. Patent Owner respectfully requests that each side be permitted up to forty-five (45) minutes of argument time for this proceeding 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 1-3, 10-12, 22-25, 28, 30 and 32-33 under Grounds 1-3 presented in the Petition (Paper 2);
- any issue raised in the Board's Institution Decision (Paper 13);
- any argument raised in the Petition (Paper 2), Patent Owner's Response (Paper 16), Petitioner's Reply (Paper 19), and Patent Owner's Sur-Reply (Paper 20), 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: March 10, 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 March 10, 2026 to lead and backup counsel of record for Petitioner as follows:

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CERTIFICATE OF COMPLIANCE WITH WORD COUNT

Pursuant to 37 C.F.R. § 42.24(d), I certify that this Sur-Reply complies with the type-volume limits of 37 C.F.R. § 42.24(b)(1) because it contains 5,575 words, excluding the parts of this Patent Owner's Sur-Reply that are exempted by 37 C.F.R. § 42.24(a), according to the word processing system used to prepare this Patent Owner's Sur-Reply.

Respectfully submitted,

Dated: February 20, 2026

By: /Daniel H. Golub/
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*Counsel for Patent Owner
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CERTIFICATE OF SERVICE,

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **PATENT OWNER'S SUR-REPLY** was served via email (as consented to by counsel) on February 20, 2026 to lead and backup counsel of record for Petitioner as follows:

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