

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZHUHAI COSMX BATTERY CO., LTD.,
Petitioner

v.

NINGDE AMPEREX TECHNOLOGY LIMITED,
Patent Owner

Case IPR2025-00389
U.S. Patent No. 11,923,498

PETITIONER’S REQUEST FOR ORAL ARGUMENT

Mail Stop “PATENT BOARD”
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to the Board’s September 9, 2025 Scheduling Order (Paper 11),
Petitioner Zhuhai CosMX Battery Co., Ltd. (“Petitioner”) respectfully requests oral
argument, currently scheduled for June 9, 2026. Petitioner requests **one hour** to
present its arguments. Under 37 C.F.R. § 42.70, and without intending to waive
any issue not specifically identified, Petitioner specifies the following issues to be
argued:

1. Whether claims 1–3, 6, 8, 17, and 19 are unpatentable under 35
U.S.C. § 103 over Sato and Takemura;
2. Whether claims 4, 5, 7, and 18 are unpatentable under 35 U.S.C. §
103 over Sato, Takemura, and Nakamura;
3. Whether claims 20 and 22 are unpatentable under 35 U.S.C. § 103
over Sato, Takemura, Oh-539, and Oh-144;
4. Whether claims 9–11, 14, and 16 are unpatentable under 35 U.S.C.
§ 103 over Sato, Takemura, and Kobayashi;
5. Whether claims 12, 13, and 15 are unpatentable under 35 U.S.C. §
103 over Sato, Takemura, Kobayashi, and Nakamura;
6. Whether claim 21 is unpatentable under 35 U.S.C. § 103 over Sato,
Takemura, Kobayashi, Oh-539, and Oh-144;
7. Whether claims 1–3, 9–11, and 17 are unpatentable under 35
U.S.C. § 103 over Takemura, Oh-539, and Kobayashi;

8. Whether claims 20–22 are unpatentable under 35 U.S.C. § 103
over Takemura, Oh-539, Kobayashi, and Oh-144;
9. Any issues specified by Patent Owner in its Request for Oral
Argument; and
10. Any other issues the Board deems necessary for issuing a final
written decision (e.g., any motion to exclude evidence and any
motion to seal evidence).

Petitioner also requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector and screen for displaying documents from a computer.

Further, Petitioner requests that the hearing be held at the USPTO's Alexandria, Virginia office because that location will be more convenient, have simpler logistics, and be less costly for Petitioner. Petitioner notes that its counsel is located in the Washington, D.C. area.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

Jason A. Fitzsimmons
Registration No. 65,367
Counsel for Petitioner

Date: April 27, 2026

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served in its entirety on April 27, 2026, upon the following parties via electronic mail:

Christopher TL Douglas (Lead Counsel) christopher.douglas@alston.com
Madeline Byrd (Back-Up Counsel) maddy.byrd@alston.com
Miranda Sooter (Back-Up Counsel) miranda.sooter@alston.com
Casey Hickey (Back-Up Counsel) casey.hickey@alston.com

ATL-CosMX-IPRs@alston.com
ALSTON & BIRD LLP

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

Jason A. Fitzsimmons
Registration No. 65,367
Counsel for Petitioner

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