

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSARA INC.
Petitioner

v.

MOTIVE TECHNOLOGIES, INC.
Patent Owner

Case IPR2025-00574
U.S. Patent No. 11,875,580

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 August 27, 2025, Scheduling Order (Paper 13),
Petitioner respectfully requests oral argument, currently scheduled for May 27,
2026. Petitioner requests one hour in which 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. Claims 1-4 are unpatentable under § 103 over Choe (EX1005);
2. Claims 1-5 are unpatentable under § 103 over Choe, Khan
(EX1007), and Ali (EX1008);
3. Claims 1-4 are unpatentable under § 103 over Choe and Workman
(EX1011);
4. Claims 5-7 are unpatentable under § 103 over Choe and
Westmacot (EX1010);
5. Claims 1-7 are unpatentable under § 103 over Choe, Westmacot,
Khan, and Ali;
6. Claims 1-7 are unpatentable under § 103 over Choe, Westmacot,
and Workman;
7. Confirming there are no inconsistencies between the claim
construction of the District Court and IPR;
8. Any issues specified by Patent Owner in its Request for Oral
Argument; and

9. 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) finding all challenged claims unpatentable.

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 are located in the Washington, DC area.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason D. Eisenberg/

Jason D. Eisenberg, Reg. No. 43,447
Counsel for Petitioner Samsara Inc.

Date: April 15, 2026

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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 15, 2026 upon the following parties via electronic mail:

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Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason D. Eisenberg/

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Counsel for Petitioner Samsara Inc.

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