

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

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper No. 13), Patent Owner Motive Technologies, Inc., hereby requests oral argument on all the asserted grounds of patentability of claims 1-7 of the '580 patent raised in instituted Grounds 1-6 as further specified below. Patent Owner requests that oral argument be held at the Dallas, Texas, USPTO Regional Office on the scheduled date of May 27, 2026.

Patent Owner requests oral argument on all issues raised in the parties' filings, including but not limited to the following:

- (1) Whether claims 1-4 are unpatentable under Section 103 under Choe;
- (2) Whether claims 1-5 are unpatentable under Section 104 under the combination of Choe, Khan, and Ali;
- (3) Whether claims 1-4 are unpatentable under Section 103 under the combination of Choe and Workman;
- (4) Whether claims 5-6 are unpatentable under Section 103 under the combination of Choe and Westmacot;
- (5) Whether claims 1-7 are unpatentable under Section 103 under the combination of Choe, Westmacot, Khan, and Ali;
- (6) Whether claims 1-7 are unpatentable under Section 103 under the combination of Choe, Westmacot, and Workman;

(7) Confirming that Petitioner failed to explain its inconsistent positions on claim construction when it filed its reply;

(8) Rebuttal to Petitioner's presentation on all issues.

Respectfully submitted,

Date: April 15, 2026

By: Hector Ribera/

Hector J. Ribera (Reg. No. 54,397)
Marton Ribera Schumann & Chang LLP
548 Market St., Suite 36117,
San Francisco, CA 94104
Email: hector@martonribera.com
Tel: (415) 360-2511

Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that on April 15, 2026, a complete and entire copy of this PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was provided via electronic mail (by consent) to the Patent Owner by serving the correspondence address identified in the Mandatory Notices:

Jason D. Eisenberg
Tyler J. Dutton
Jean M. Selep
STERNE, KESSLER, GOLDSTEIN & FOX PLLC
1101 K Street, NW, 10th Floor
Washington, DC 20005
202.371.2600 (reception)
202.371.2540 (facsimile)

jasone-PTAB@sternekessler.com
tdutton-PTAB@sternekessler.com
jselep-PTAB@sternekessler.com
PTAB@sternekessler.com

Date: April 15, 2026

By: /Hector Ribera/
Hector J. Ribera (Reg. No. 54,397)
Marton Ribera Schumann & Chang LLP
548 Market St., Suite 36117,
San Francisco, CA 94104
Email: hector@martonribera.com
Tel: (415) 360-2511

Attorneys for Patent Owner