

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTEL CORPORATION
Petitioner

v.

ADVANCED CLUSTER SYSTEMS, INC.
Patent Owner

IPR2025-00916
U.S. Patent No. 11,811,582

PETITIONER'S REQUEST FOR ORAL ARGUMENT

In accordance with 37 C.F.R. § 42.70(a), Petitioner Intel Corporation (“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 August 13, 2026. *See* Scheduling Order, Paper 16, p. 14.

In addition, the Board has scheduled three (3) related *inter partes* review proceedings for oral argument on August 13, 2026: IPR2025-00913, IPR2025-00914, and IPR2025-00915. *See* Scheduling Orders (Papers 16 and 17). IPR2025-00913 challenges U.S. Patent No. 11,570,034; IPR2025-00914 challenges U.S. Patent No. 12,021,679; and IPR2025-00915 challenges U.S. Patent No. 11,563,621.

Petitioner requests that these three (3) *inter partes* review proceedings be consolidated with IPR2025-00916. Consolidation of the hearings for these four (4) cases would be for efficiency, and a single transcript could be provided for all cases.¹

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. Each party will have sixty (60)

¹ Petitioner is concurrently filing a Request for Oral Argument for IPR2025-00913, IPR2025-00914, and IPR2025-00915.

minutes of total time to present arguments in the consolidated hearing. Each side may present arguments for the four proceedings during the allotted time. As the party with the burden of proof and persuasion, Petitioner will proceed first to present its case with regard to the challenged claims and grounds set forth in the Petitions. Thereafter, Patent Owner may respond to Petitioner's cases and Petitioner may use any of its remaining time for rebuttal regarding Patent Owner's arguments regarding the challenged claims. And, thereafter, Patent Owner may use any of its remaining time for sur-rebuttal, to respond to Petitioner's rebuttal arguments.

Petitioner and Patent Owner have conferred and are in agreement as to consolidation and the 60 minutes worth of time.

With respect to IPR2025-00916, Petitioner respectfully requests the opportunity to address all issues raised in the papers including:

- Claims 1-25, 27-28, and 30 under 35 U.S.C. § 103 over Menon in view of Trefethen, RS6000 and POEref;
- Claims 26 and 29 under 35 U.S.C. § 103 over Menon in view of Trefethen, RS6000 and POEref further in view of MPIref;
- any other issues raised in any paper filed by the parties; and
- any responses to issues raised by the Board or Patent Owner at the oral argument.

The issues identified above are for IPR2025-00916. Additional papers

are also being filed for the other IPRs identifying their respective issues.

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

Respectfully submitted,

Dated: June 25, 2026
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/Andrew S. Ehmke/
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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 June 25, 2026

Manner of service Electronic Email: dlindner@crowell.com;
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Documents served **PETITIONER'S REQUEST FOR ORAL ARGUMENT**

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