

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRAUMANN USA, LLC,
Petitioner,

v.

SMART DENTURE CONVERSIONS, LLC,
Patent Owner.

Case No. IPR2025-00956

U.S. Patent No. 11,937,992

**JOINT MOTION OF PETITIONER AND PATENT OWNER
TO MODIFY THE SCHEDULE OF IPR2025-00956
TO RESCHEDULE AND CONSOLIDATE THE FINAL HEARING WITH
CO-PENDING PGR2025-00054**

Pursuant to the Board's authorization in its email dated July 15, 2026, Petitioner Straumann USA, LLC and Patent Owner Smart Denture Conversions, LLC respectfully jointly move to reschedule the oral argument in this IPR2025-00956 (currently scheduled for August 27, 2026) to September 9, 2026, and to consolidate it with the oral argument in PGR2025-00054 (currently scheduled for September 9, 2026).

Good cause exists for rescheduling the oral argument in this IPR2025-00956 and consolidating it with the oral argument in PGR2025-00054 because these two proceedings present several substantially similar issues, arguments and evidence:

1. The proceedings in IPR2025-00956 and PGR2025-00054 are between the same parties and before the same panel.

2. The '992 patent challenged in this IPR2025-00956 and the '781 patent challenged in PGR2025-00054 both issued from continuation applications of the same parent applications and claim priority to the same series of priority applications. Both patents have virtually identical specifications. *See* IPR2025-00956, Exh. 1001; PGR2025-00054, Exh. 1001.

3. Petitioner's Grounds 1–3 in this IPR2025-00956 and Ground 2 in PGR2025-00054 are based in part on substantially similar evidence and arguments, including that the scope of the challenged claims is not supported by the priority applications or the specification, respectively. *Compare* IPR2025-00956, Paper 2 at

32-44 *with* PGR2025-00054, Paper 2 at 40-52. Patent Owner's responses to those grounds in both proceedings are also based in part on substantially similar evidence and arguments, including that the claims are fully supported by the priority applications or the specification, respectively. *Compare* IPR2025-00956, Paper 26 at 29-46 *with* PGR2025-00054, Paper 29 at 36-52.

4. Petitioner's Grounds 4–5 in this IPR2025-00956 and Grounds 3–4 in PGR2025-00054 are based in part on substantially similar obviousness evidence and arguments, including several of the same prior art references (Bernhard, Poovey, Gracco and Derey). *Compare* IPR2025-00956, Paper 2 at 54-81 *with* PGR2025-00054, Paper 2 at 63-105. Patent Owner's responses to those grounds in both proceedings are also based in part on substantially similar evidence and arguments, including that a person of ordinary skill in the art would not have been motivated to combine the above-mentioned prior art. *Compare* IPR2025-00956, Paper 26 at 64-73 *with* PGR2025-00054, Paper 29 at 70-81.

Given these substantially similar issues, arguments and evidence, Petitioner and Patent Owner respectfully submit that it will be more efficient and less burdensome for the Board and the parties to hold one consolidated oral argument for both proceedings instead of two separate oral arguments, which would be longer and likely repetitive.

Although Petitioner and Patent Owner jointly request a consolidated hearing, they disagree regarding how much argument time is appropriate.

1. Petitioner requests that, if the Board holds a consolidated hearing for both proceedings, each side be allotted a total of 90 minutes for argument at the consolidated hearing. This would result in each side having 30 minutes less argument time than if there were two oral arguments with 60 minutes of argument time for each side at each oral argument. Petitioner respectfully submits that 90 minutes for argument at a consolidated hearing is appropriate given the other issues that are not common to both proceedings, including for example Ground 1 in PGR2025-00054 based on indefiniteness and the portions of Ground 2 in PGR2025-00054 based on different support arguments that are not presented in this IPR2025-00956.¹

2. Patent Owner submits, subject to the Board's preference, that a total of 75 minutes for argument for each side at the consolidated hearing would be more than sufficient. In view of the substantial overlap of issues and prior art, a three-hour

¹ If the Board holds a consolidated oral argument for both proceedings, Petitioner's and Patent Owner's requests in this motion for 90 and 75 minutes of argument time, respectively, supersede their respective requests for argument time in their recently-filed requests for oral argument in IPR2025-00956. *See* Papers 35 at 2, and 36 at 2.

hearing, as opposed to a two-and-one-half-hour hearing, would be more repetitive and less focused.

Dated: July 16, 2026

Respectfully submitted,

/s/ Sheila Mortazavi

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Lead counsel for Patent Owner Smart
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CERTIFICATE OF SERVICE

The undersigned certifies that on July 16, 2026, a true and correct copy of Joint Motion of Petitioner and Patent Owner to Modify the Schedule of IPR2025-00956 to Reschedule and Consolidate the Final Hearing with Co-Pending PGR2025-00054 was served by email on counsel for Patent Owner at the following email addresses:

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