

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADB Safegate Sweden AB,
ADB Safegate BV, and
ADB Safegate Americas, LLC

Petitioner,

v.

Honeywell International Inc.,

Patent Owner.

Case PGR2023-00053
U.S. Patent No. 11,538,349

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), Petitioners respectfully request in-person oral argument for PGR2023-00053 (the “Matter”). The issues to be argued with respect to this Matter include the following:

1. Claim constructions for i) “directional ... guidance”; ii) “speed guidance”; and iii) “displaying ... with the merged data set.”
2. The claims being directed to an abstract idea under step one of Alice.
3. The claims lacking an inventive concept under step two of Alice.
4. The prior art meeting the “displaying” limitation of the independent claims.
5. Any additional issues on which the Board seeks information or clarification.

Petitioners request that each party be allowed a total of sixty (60) minutes for its argument in this Matter. Petitioners may reserve a portion of its time for rebuttal.

Petitioners further request the use of audio-visual equipment to assist its arguments and to display its demonstrative exhibits. Petitioners request a computer connectable projector, an ELMO, and a screen. If instead the Board decides oral argument will be conducted by remote videoconferencing, Petitioners request permission to use video-conferencing software to allow the presentation of demonstratives.

Dated: October 23, 2024

/Marc Weinstein/

Marc K. Weinstein (Reg. No. 43,250)

Xsensus LLP

Attorney for Petitioners

CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(E), 42.105(A))

The undersigned hereby certifies that the foregoing document was served in its entirety on October 23, 2024, upon the following parties via Electronic Mail addresses: sbitzman@crowell.com, joshsmith@crowell.com, HoneywellPGRservice@crowell.com:

Scott Bittman
Josh Smith

Dated: October 23, 2024

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