

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,

Petitioners

v.

HONEYWELL INTERNATIONAL INC.,

Patent Owner

Case PGR2023-00053
Patent 11,538,349 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order entered on March 11, 2024 (Paper 11), Patent Owner respectfully requests in-person oral argument in the above-identified proceeding, currently scheduled for December 11, 2024.

Patent Owner intends to argue the following issues:

1. Any issues raised by Patent Owner in these proceedings, including in Patent Owner's Response (Paper 15) and Patent Owner's Sur-Reply (Paper 18), including:

- a. the proper construction of disputed claim terms;
- b. the patent eligibility of the challenged claims, and Petitioners' failure to establish that the challenged claims are directed to patent ineligible subject matter (Ground 1), and
- c. the validity of the challenged claims over the asserted prior art, and Petitioners' failure to establish that the challenged claims are either anticipated or rendered obvious in view of the asserted prior art (Grounds 2 and 3);

2. Any issues raised in Petitioners' Petition (Paper 1) and Reply (Paper 17);

3. Any issues raised in the Board's Institution Decision (Paper 10);

4. Any issues raised in any Motions to Exclude Evidence that may be filed on or after the date of filing this request;

5. Any additional issues raised by the Board or Petitioners at Oral Argument.

Patent Owner requests that each side be given 60 minutes for oral argument.

PGR2023-00053 Patent Owner's Request for Oral Argument
U.S. Patent No. 11,538,349

Patent Owner reserves the right for sur-rebuttal.

Patent Owner requests the use of a projector suitable for connection to a computer for display of PowerPoint during the oral hearing.

Respectfully submitted,

Dated: October 30, 2024

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2024, I caused a true and correct copy of the foregoing materials:

- Patent Owner's Request for Oral Argument

to be served via electronic mail on the following counsel of record for Petitioners:

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