

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY, JAGUAR LAND ROVER NORTH AMERICA  
LLC, VOLVO CARS OF NORTH AMERICA LLC, TOYOTA MOTOR NORTH  
AMERICA, INC., AND SUBARU OF AMERICA, INC.,  
Petitioner

v.

CRUISE CONTROL TECHNOLOGIES LLC,  
Patent Owner

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Case IPR2014-00279  
Patent 6,324,463

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to the Board's July 2, 2014 Scheduling Order (Paper 20), Patent Owner respectfully requests oral argument for the trial currently scheduled on March 24, 2015 in this proceeding. Pursuant to 37 C.F.R. § 42.70, Patent Owner requests one hour of argument time and specifies the following issues, without intent to waive consideration of any issue not requested, to be argued.

### **ISSUES TO BE ADDRESSED DURING ORAL ARGUMENT**

- I. Proper construction and scope of the claims.
- II. Ground A: whether claims 1–3, 5, 12–14, 18, 21, 25–26, and 34–36 are anticipated by Mizuno pursuant to 35 U.S.C. §102(b).
- III. Ground B: whether claims 1–2, 12–16, 21, 25–27, and 29–31 are anticipated by Miura pursuant to 35 U.S.C. § 102(b).
- IV. Ground C: whether claims 4, 19–20, 23, and 27–28 would have been obvious under Mizuno in view of the ordinary skill in the art pursuant to 35 U.S.C. § 103.
- V. Rebuttal to Petitioner's presentation on all matters including the issues listed above.

Patent Owner additionally requests permission to use audiovisual display equipment to present demonstratives, including a projector and screen for

computer-generated slides. Any demonstrative exhibits will be served at least five business days before the oral argument as required by 37 C.F.R. § 42.70(b).

This filing is timely, being submitted no later than DUE DATE 4 (February 23, 2015), according to the Scheduling Order.

## CONCLUSION

In light of the remarks herein, Patent Owner respectfully requests the opportunity to have an oral argument before the Board. If the Board has any questions, comments, or suggestions, the undersigned attorney earnestly requests a telephone conference.

No fees are required for filing this amendment; however, the Commissioner is authorized to charge any additional fees which may be required, or credit any overpayment, to Kasha Law LLC, Deposit Account No. 50-4075.

Date: February 23, 2014

Respectfully submitted,

/John R. Kasha/

John R. Kasha, Lead Counsel  
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## CERTIFICATE OF SERVICE

I hereby certify that on the 23<sup>th</sup> day of February 2015, a true and correct copy of Patent Owner's Request for Oral Argument by Cruise Control Technologies LLC was served via electronic mail upon [Subaru-CCT-IPR@dlapiper.com](mailto:Subaru-CCT-IPR@dlapiper.com) – counsel of record for Petitioners Ford Motor Company, Jaguar Land Rover North America LLC, Volvo Cars of North America LLC, Toyota Motor North America, Inc., and Subaru of America, Inc. (collectively “Petitioner”).

Respectfully submitted,

/John R. Kasha/

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