

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Case No. IPR2014-00281
Patent 6,324,463

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's July 2, 2014 Scheduling Order (Paper 18), Petitioners respectfully request oral argument for the trial currently scheduled on March 24, 2015 in this proceeding. Pursuant to 37 C.F.R. § 42.70, Petitioners request one hour of argument time and specify the following issues, without intent to waive consideration of any issue not requested, to be argued:

- I. The Proper Construction and Scope of the Claims under the Broadest Reasonable Interpretation Standard.
- II. Whether Claims 1-3, 5, 12-16, 18, 19, 21, 25, 26, and 28 are Unpatentable Under 35 U.S.C. § 102 as anticipated by Narita.
- III. Whether Claims 17 and 22-24 are Unpatentable Under 35 U.S.C. § 103 as obvious over Narita in view of the knowledge of a person of ordinary skill.
- IV. Whether Claims 17 and 22-24 are Unpatentable Under 35 U.S.C. § 103 as obvious over Narita in view of Beiswenger.
- V. Whether Claims 17, 23, and 24 are Unpatentable Under 35 U.S.C. § 103 as obvious over Narita in view of Nagashima.
- VI. Whether Claims 1-3, 5, 12, and 15 are unpatentable under 35 U.S.C. § 103 as obvious over Narita in view of Admitted Prior Art.
- VII. Whether Claims 1-3, 5, 12, and 15 are unpatentable under 35 U.S.C. § 103 as obvious over Narita in view of the NHTSA Report.

VIII. Whether Claims 18, 19, 26, and 29-31 are unpatentable under 35 U.S.C. § 102 as anticipated by Nagashima.

IX. Rebuttal to Patent Owner's presentation on all matters including the issues listed above.

Petitioner additionally requests permission to use audiovisual display equipment to present demonstratives, including a projector and screen for computer-generated slides. Any demonstrative exhibits beyond those attached to the Petition 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.

Date: February 20, 2015

Respectfully submitted,
ERISE IP, P.A.

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ATTORNEYS FOR PETITIONERS

**CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.105(a)**

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on February 20, 2015, a complete and entire copy of Petitioners' Request for Oral Argument was served by electronic mail to Counsel for Patent Owner at the e-mail addresses identified below:

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