

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 IPR: 2014-00289
Patent 6,324,463

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board’s July 2, 2014 Scheduling Order (Paper 14), 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 13, 18, and 25–27 are unpatentable under 35 U.S.C. § 102(b) as being anticipated by Yoshimitsu.
- III. Ground B: whether claims 12–13 are unpatentable under 35 U.S.C. § 102(b) as being anticipated by Yagihashi.
- IV. Ground C: whether claims 1, 2, 12, 14, 15, 27 and 34–36 are invalid under 35 U.S.C. §103 as obvious over Yoshimitsu in view of 300zx Manual.
- V. Ground D: whether claims 19–20 are invalid under 35 U.S.C. §103 as obvious over Yoshimitsu in view of Nagashima.
- VI. Ground E: whether claims 1–5, 14, 26–28, and 34–36 are invalid under 35 U.S.C. § 103(a) as being obvious over Yagihashi in view of Yoshimitsu.¹

¹ Petitioner says “The Admitted Prior Art and/or Yoshimitsu.”

VII. 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 23th 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 – counsel of record for Petitioner Ford Motor Company, Jaguar Land Rover North America, LLC, and 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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