UNITED STATE	ES PATENT AND	TRADEMARK OFFICE
BEFORE THE	PATENT TRIAL A	AND APPEAL BOARD
TOYOTA MO	TOR NORTH AM Petitioners	ERICA, INC., ET AL.,

CRUISE CONTROL TECHNOLOGIES LLC,
Patent Owner

V.

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CASE IPR: 2014-00291 Patent 6,324,463

PETITIONERS' REQUEST FOR ORAL ARGUMENT



Pursuant to the Board's July 2, 2014 Scheduling Order (Paper 12), Petitioners respectfully request oral argument for the trial currently scheduled on March 25, 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, 12-14, 18, 19, 25-27, 29-31, and 34-36 are Unpatentable Under 35 U.S.C. § 102 as anticipated by Prometheus.
- III. Whether Claims 3, 5, 12, 15, 16, 21, and 28 are Unpatentable Under 35 U.S.C. § 103 as obvious over Prometheus in view of Narita.
- IV. Whether Claim 4 is Unpatentable Under 35 U.S.C. § 103 as obvious over Prometheus in view of Celsior.
- V. Rebuttal to Patent Owner's presentation on all matters including the issues listed above.

Petitioners additionally request 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).



## TOYOTA ET AL.'S REQUEST FOR ORAL ARGUMENT Case IPR2014-00291

This filing is timely, being submitted no later than DUE DATE 4 (February 23,

2015), according to the Scheduling Order.

Respectfully submitted,

/William H. Mandir/

William H. Mandir Registration No. 32,156

Sughrue Mion, PLLC CUSTOMER NUMBER: 23373

Date: February 20, 2015



## CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the attached Petitioner's Request for

Oral Argument was sent via e-mail on February 20, 2015, to the following:

John R. Kasha, Reg. No. 53,100 Kasha Law LLC 14532 Dufief Mill Rd. North Potomac, MD 20878 (703) 867-1886 john.kasha@kashalaw.com

Counsel of Record for U.S. Patent No. 6,324,463

Date: February 20, 2015 Respectfully submitted,

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