

Filed on behalf of UUSI, LLC
By: Monte L. Falcoff (mlfalcoff@hdp.com)
Michael R. Nye (mnye@hdp.com)
HARNES, DICKEY & PIERCE, P.L.C.
5445 Corporate Drive, Ste. 200
Troy, MI 48098
Telephone: (248) 641-1600
Facsimile: (248) 641-0270

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROSE NORTH AMERICA, INC.
and
BROSE FAHRZEUGTEILE GMBH & CO. KG, HALLSTADT
Petitioner

v.

UUSI, LLC
Patent Owner

Case IPR2014-00417
Patent 7,579,802

**PATENT OWNER'S CONTINGENT REQUEST FOR PARTICIPATION IN
ORAL ARGUMENT**

Pursuant to Rule 42.70(a) and the Board's Scheduling Order, Patent Owner UUSI does not request oral argument for the hearing currently scheduled for April 30, 2015 in IPR2014-00417 relating to U.S. Patent No. 7,579,802 (the "'802 Patent"). But if Petitioner requests oral argument then Patent Owner requests to participate and argue in the hearing. Patent Owner relies on its briefing and evidence in the record for any and all remaining issues not specifically identified for oral argument.

I. Issues to Be Argued

A. Excluding evidence as requested in Patent Owner's Motion to Exclude filed concurrently herewith.

B. Lack of anticipation of Claims 1, 7-9 and 14 of the '802 Patent by Itoh, including the insufficiency and unreliability of Petitioner's evidence.

C. Lack of obviousness of Claims 1, 6-9 and 14 of the '802 Patent by Itoh, including the insufficiency and unreliability of Petitioner's evidence.

D. Lack of anticipation of Claims 7, 9 and 14 of the '802 Patent by Kinzl.

E. Lack of obviousness of Claims 7, 9 and 14 of the '802 Patent by Kinzl.

F. Lack of obviousness of Claims 1, 6-9 and 14 of the '802 Patent by Itoh and Kinzl.

G. Lack of obviousness of Claims 7-9 and 14 of the '802 Patent by Itoh and Zuckerman, including the insufficiency and unreliability of Petitioner's evidence.

H. Lack of obviousness of Claims 7-9 and 14 of the '802 Patent by Itoh, Kinzl and Zuckerman, including the insufficiency and unreliability of Petitioner's evidence.

I. Issues noted in Petitioner's request for oral arguments or otherwise raised by the Board.

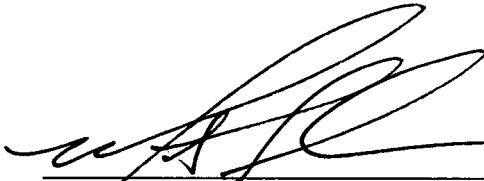
II. Format of Oral Argument

If rebuttals are allowed then Patent Owner requests that it be allowed to reserve some of its allotted time for rebuttal argumentation.

III. Related Proceedings

The issues raised in this proceeding and in IPR2014-00416 present overlapping issues, and Patent Owner suggests that oral argument in these proceedings be handled together if Petitioner requests oral argument.

By:



March 26, 2015

HARNES, DICKEY & PIERCE, P.L.C.

Monte L. Falcoff (Reg. No. 37,617)

Michael R. Nye (Reg. No. 62,126)

5445 Corporate Drive, Ste. 200

Troy, MI 48098

(248) 641-1600

(248) 641-0270 Fax

mlfalcoff@hdp.com

mnye@hdp.com

Attorneys for Patent Owner

Certificate of Service Under 37 C.F.R. § 42.6(e)(4)


A copy of this Patent Owner's Contingent Request for Participation in Oral Argument has been served to counsel for the Petitioner at the following electronic mail addresses, pursuant to consent of Petitioner, on this 26th day of March, 2015.

Craig D. Leavell (Reg. No. 48505)
Craig.leavell@kirkland.com
Elizabeth A. Cutri
Elizabeth.cutri@kirkland.com
KIRKLAND & ELLIS LLP
300 North LaSalle Street
Chicago, Illinois 60654
Telephone: (312) 862-2000
Fax: (312) 862-2200

Luke L. Dauchot, P.C. (*pro hac vice*)
Luke.dauchot@kirkland.com
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, California 90071
Telephone: (213) 680-8400
Fax: (213) 680-8500

Attorneys of Record for Brose North America, Inc.

By:



HARNESS, DICKEY & PIERCE, P.L.C.
Monte L. Falcoff (Reg. No. 37,617)
Michael R. Nye (Reg. No. 62,126)
5445 Corporate Drive, Ste. 200
Troy, MI 48098
(248) 641-1600
(248) 641-0270 Fax
mlfalcoff@hdp.com
mnye@hdp.com

Attorneys for Patent Owner