UNITED STATES PATENT AND TRADEMARK OFFICE ————— BEFORE THE PATENT TRIAL AND APPEAL BOARD —————

FORD MOTOR COMPANY Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC. Patent Owner.

U.S. Patent No. 8,214,097

IPR Case No.: IPR2014-00570

PETITIONER'S REQUEST FOR ORAL ARGUMENT



Case No.: IPR2014-00570

Attorney Docket No.: FPGP0110IPR1

Pursuant to 37 C.F.R. § 42.70(a), Petitioner, Ford Motor Company submits this Request for Oral Argument on all of the instituted grounds of unpatentability of U.S. Patent No. 8,214,097. Petitioner requests no more than one hour per side of oral argument time. The Board has already scheduled Oral Hearing for July 1, 2015, see Paper 23, page 2.

Without intent to waive consideration of any issue not requested, Petitioner requests oral argument on the following issues:

- 1. Whether Patent Owner's proposed construction for claim 30 should be rejected;
- 2. Whether claims 30, 31, 35, 36 and 39 are obvious under 35 U.S.C. § 103 over the combination of Severinsky '970 and Anderson;
- 3. Whether claim 32 is obvious under 35 U.S.C. § 103 over the combination of Severinsky '970, Anderson, and Yamaguchi;
- 4. Whether claim 33 is obvious under 35 U.S.C. § 103 over the combination of Severinsky '970, Anderson, Yamaguchi and Katsuno;
- 5. Any motion filed by Patent Owner, including any motion to exclude;
- 6. Any argument not specifically identified that is raised by Patent Owner at oral argument; and
- 7. Any issue that the Board requests.



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Dated: <u>May 15, 2015</u>

Respectfully submitted,

/Sangeeta G. Shah/

Sangeeta G. Shah (Reg. No. 38,614)

Frank A. Angileri (Reg. No. 36,733)

Michael D. Cushion (Reg. No. 55,094)

Andrew B. Turner (Reg. No. 63,121)

BROOKS KUSHMAN P.C.

1000 Town Center, 22nd Floor Southfield, MI 48075 (248) 358-4400

Lissi Mojica (Reg. No. 63,421) Kevin Greenleaf (Reg. No. 64,062)

DENTONS US LLP

1530 Page Mill Road, Suite 200 Palo Alto, CA 94304-1125 650 798 0300

Attorneys for Petitioner



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 15, 2015 a complete and entire copy of **PETITIONER'S REQUEST FOR ORAL ARGUMENT**, was served via electronic mail by serving the correspondence email address of record as follows:

LEAD COUNSEL	BACK-UP COUNSEL
Timothy W. Riffe, Reg. No. 43,881	Kevin E. Greene, Reg. No. 46,031
	Ruffin B. Cordell, Reg. No. 33,487
3200 RBC Plaza	Linda L. Kordziel, Reg. No. 39,732
60 South Sixth Street	
Minneapolis, MN 55402	3200 RBC Plaza
Tel: (202) 783-5070	60 South Sixth Street
Email: IPR36351-0013IP1@fr.com;	Minneapolis, MN 55402
Riffe@fr.com;	Tel: (202) 783-5070
	Email: IPR36351-0013IP1@fr.com;
	Greene@fr.com

Respectfully submitted,

/Sangeeta G. Shah/

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Michael D. Cushion (Reg. No. 55,094)

Andrew B. Turner (Reg. No. 63,121)

Brooks Kushman P.C.

1000 Town Center, 22nd Floor Southfield, MI 48075

(248) 358-4400

Lissi Mojica (Reg. No. 63,421)

Kevin Greenleaf (Reg. No. 64,062)

Dentons US LLP

1530 Page Mill Road, Suite 200 Palo Alto, CA 94304-1125 650 798 0300

Attorneys for Petitioner

