

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. 7,104,347 to Severinsky *et al.*

IPR Case No.: IPR2014-00571

PETITIONER'S REQUEST FOR ORAL ARGUMENT

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. 7,104,347. The Board has already scheduled Oral Hearing for July 1, 2015, *see* Paper 22, page 2. Petitioner requests no more than one hour per side of oral argument time.

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

1. Whether Patent Owner's proposed claim construction for "setpoint" should be rejected;
2. Whether claims 1, 6, 7, 9, 15, 21, 23, and 36 of the '347 patent are unpatentable as being obvious obviousness over U.S. Patent No. 5,343,970 to Severinsky and U.S. Patent No. 5,586,613 to Ehsani;
3. Any motion filed by Patent Owner, including any motion to exclude;
4. Any argument not specifically identified that is raised by Patent Owner at oral argument; and
5. Any issue that the Board requests.

Dated: May 15, 2015

/Frank A. Angileri/
Frank A. Angileri (Reg. No. 36,733)
BROOKS KUSHMAN P.C.

Lissi Mojica (Reg. No. 63,421)
Kevin Greenleaf (Reg. No. 64,062)
DENTONS US LLP
Attorneys for Petitioner

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 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 Tel: (202) 783-5070 Email: IPR36351-0011IP1@fr.com Riffe@fr.com; Greene@fr.com	Kevin E. Greene, Reg. No. 46,031 Ruffin B. Cordell, Reg. No. 33,487 Linda L. Kordziel, Reg. No. 39,732 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 Tel: (202) 783-5070 Email: IPR36351-0011IP1@fr.com Riffe@fr.com; Greene@fr.com

Respectfully submitted,

/Frank A. Angileri/
Frank A. Angileri (Reg. No. 36,733)
John E. Nemazi (Reg. No. 30,876)
John P. Rondini (Reg. No. 64,949)
Erin K. Bowles (Reg. No. 64,705)
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