Filed on behalf of UUSI, LLC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEBASTO ROOF SYSTEMS, INC.
Petitioner

v.

UUSI, LLC Patent Owner

Case IPR2014-00650 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 <u>not</u> request oral argument for the hearing currently scheduled for June 29, 2015 in IPR2014-00650 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. Lack of obviousness of Claims 15 and 16 of the '802 Patent by Itoh and Kinzl.
- B. Lack of obviousness of Claim 11 of the '802 Patent by Itoh, Kinzl, and Jones.
- C. Lack of anticipation of Claims 1, 6-9, 15, and 16 of the '802 Patent by Lamm and Itoh.
- D. Lack of obviousness of Claim 11 of the '802 Patent by Lamm, Itoh, and Duhame.
- E. Lack of obviousness of Claims 1, 7-9, 11, 15, and 16 of the '802 Patent by Duhame and Kinzl.
- F. 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 IPR2014-00648 and IPR2014-00649 present overlapping issues, and Patent Owner suggests that oral argument in these proceedings be handled together if Petitioner requests oral argument.

Bv:

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## 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 26 th day of 2015.

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