

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.: IPR2014-00884

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 the Oral Hearing for IPR2014-00884 as well as for the following related IPRs on July 1, 2015:

1. IPR2014-00570 (USPN 8,214,097)
2. IPR2014-00571 (USPN 7,104,347)
3. IPR2014-00579 (USPN 7,104,347)
4. IPR2014-00875 (USPN 7,559,388)
5. IPR2014-00904 (USPN 7,237,634)

Concerning the total oral hearing time for the above six IPRs, the Petitioner and the Patent Owner jointly propose a total of 3.5 hours per side, which averages to only 35 minutes per IPR. Additionally, the Board indicated in an order for related later-filed IPRs (*see, e.g.* IPR2015-00606, Paper 9, pp. 2-3) that the above IPRs may impact those later-filed IPRs, so the parties would appreciate whatever time the Board can grant.

Concerning procedure, the parties also believe it would be helpful to group these IPRs into three groups, and finish one group before beginning the next. The parties agree on the following groups:

1. IPR2014-00571 ('347 Patent) and IPR2014-00904 ('634 Patent)
2. IPR2014-00579 ('347 Patent) and IPR2014-00884 ('347 Patent)
3. IPR2014-00570 ('097 Patent) and IPR2014-00875 ('388 Patent)

Without intent to waive consideration of any issue not requested, Petitioner requests oral argument on the following issues for IPR2014-00884:

1. Whether Patent Owner's proposed claim construction for "setpoint" and "monitor patterns of vehicle operation over time" should be rejected;
2. Whether claims 1, 7, 10, and 21 of the '347 Patent are obvious under 35 U.S.C. § 103 over Caraceni;
3. Whether claims 23 and 24 of the '347 Patent are obvious under 35 U.S.C. § 103 over Tabata '201 and Tabata '541;
4. Any motion filed by Patent Owner, including any motion to exclude;
5. Any argument not specifically identified that is raised by Patent Owner at oral argument; and
6. Any issue that the Board requests.

Dated: June 9, 2015

Respectfully submitted,

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Case No.: IPR2014-00884
Attorney Docket No.: FPGP0101IPR4

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Certificate of Service

The undersigned hereby certifies that on June 9, 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:

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