

Filed on behalf of Nidec Motor Corporation

IPR2014-01121

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZHONGSHAN BROAD OCEAN MOTOR CO., LTD.; BROAD
OCEAN MOTOR, LLC; AND BROAD OCEAN
TECHNOLOGIES, LLC
Petitioners

v.

NIDEC MOTOR CORPORATION
Patent Owner

Case No. IPR2014-01121
U.S. Patent No. 7,626,349

Before BENJAMIN D.M. WOOD, *Administrative Patent Judge*
JAMES A. TARTAL, *Administrative Patent Judge*
PATRICK M. BOUCHER, *Administrative Patent Judge*

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Nidec Motor Corporation (“Nidec”) respectfully requests oral argument for the trial currently scheduled for February 23, 2016.

Issues For Hearing

Pursuant to 37 C.F.R. § 42.70, Patent Owner specifies the following issues to be argued:

- I. Whether Petitioners failed to establish claims 1-3, 8, 9, 12, 16, and 19 of the ’349 Patent are anticipated by JP 2003-348885 to Hideji;
- II. Whether Petitioners failed to establish claims 1-3, 8, 9, 12, 16, and 19 of the ’349 Patent are obvious over U.S. Patent No. 5,410,230 to Bessler in View of Peter Franz Kocybik, *Electronic Control of Torque Ripple in Brushless Motors* (University of Plymouth, July 2000);
- III. Whether objective indicia demonstrate claims 1-3, 8, 9, 12, 16, and 19 of the ’349 Patent are non-obvious;
- IV. Whether Patent Owner’s Conditional Motion to Amend Claims 1, 16, and 19 should be granted;
- V. Whether Petitioners’ Motion to Exclude Evidence should be denied; and
- VI. Whether Patent Owner’s Motion to Exclude Evidence should be granted.

In the event any fees are required for this Request, please charge Deposit Account No. 19-0522.

Dated: February 3, 2016

Respectfully Submitted,

/s/ Scott R. Brown

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ATTORNEYS FOR PATENT OWNER
NIDEC MOTOR CORPORATION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of February, 2016, a true and accurate copy of the foregoing *Patent Owner's Request for Oral Argument* was filed through the Patent Review Processing System and served on the following counsel for Petitioner via email:

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