

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 IPR2014-01121¹
Patent 7,626,349

PETITIONERS' REQUEST FOR ORAL ARGUMENT

¹ Case IPR2015-00762 has been joined with this proceeding.

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's October 13, 2015 Supplemental Scheduling Order (Paper No. 70), Petitioners Zhongshan Broad Ocean Motor Co., Ltd., Broad Ocean Motor, LLC, and Broad Ocean Technologies, LLC (collectively, "Broad Ocean"), respectfully request oral argument for the trial currently scheduled on February 23, 2016.

Issues For Hearing

Pursuant to 37 C.F.R. §42.70, Petitioners specify the following issues to be argued:

I. Whether claims 1-3, 8, 9, 12, 16 and 19 of the '349 patent are anticipated by Hideji Japanese Patent Publication JP2003-348885.

II. Whether 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 Kocybik, Electronic Control of Torque Ripple in Brushless Motors (University of Plymouth, July 2000).

III. Whether Patent Owner has established commercial success and the requisite nexus of any alleged commercial success to the challenged claims sufficient to overcome Petitioner's *prima facie* case of obviousness;

IV. Whether Patent Owner satisfied its burden of proof for showing support for proposed amended claims 21-23 in the '349 patent specification and for

showing the patentability of proposed amended claims 21-23 over the prior art of record known to Patent Owner.

V. Whether evidence should be excluded as identified in Petitioner's Motion to Exclude.

Respectfully submitted,

Dated: February 3, 2016

/ Steven F. Meyer /

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e) and 37 C.F.R. §42.105(b), the undersigned hereby certifies that on February 3, 2016, a complete and entire copy of the foregoing **Petitioners' Request For Oral Argument** was electronically served in its entirety on the Patent Owner of record (as agreed upon by counsel) at sbrown@hoveywilliams.com, mwalters@hoveywilliams.com, and litigation@hoveywilliams.com.

Additionally, the undersigned certifies that on February 3, 2016, a complete and entire copy of this **Petitioners' Request For Oral Argument** was electronically served on the Patent Owner's below-listed counsel of record at jschwent@thompsoncoburn.com, djinkins@thompsoncoburn.com, and syoo@thompsoncoburn.com, in the co-pending litigation *Nidec Motor Corporation v. Broad Ocean Motor LLC et al.*, Civil Action No. 4:13-CV-01895-JCH (E.D. Mo.), as agreed upon by the parties.

Dated: February 3, 2016

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