

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

NIDEC MOTOR CORPORATION  
Patent Owner

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

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**PETITIONERS' REQUEST FOR ORAL ARGUMENT**

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Pursuant to the Board's January 21, 2015, Scheduling Order (Paper No. 21), Petitioners Zhongshan Broad Ocean Motor Co., Ltd., Broad Ocean Motor, LLC, and Broad Ocean Technologies, LLC (collectively, "Broad Ocean"), respectfully requests oral argument for the trial currently scheduled on October 16, 2015.

### **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 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).
- II. Whether Patent Owner has established commercial success and the requisite nexus of any alleged commercial success to the novel portions of the challenged claims sufficient to overcome Petitioner's prima facie case of obviousness; and
- III. Whether evidence should be excluded as identified in Petitioner's Motion to Exclude.

Dated: September 21, 2015

Respectfully submitted,

By: /s/ Charles S. Baker

Charles S. Baker

(Admitted Pro Hac Vice)

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ZHONGSHAN BROAD OCEAN  
MOTOR CO., LTD.*

## 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 September 21, 2015, 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 September 21, 2015, a complete and entire copy of the foregoing **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: September 21, 2015

*/s/ Charles S. Baker*

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