

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ALLSTEEL INC.  
Petitioner,

v.

DIRTT ENVIRONMENTAL SOLUTIONS LTD.  
Patent Owner.

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Case No. IPR2015-01691  
Patent No. 8,024,901  
Issue Date: September 27, 2011

Title: INTEGRATED RECONFIGURABLE WALL SYSTEM

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT  
PURSUANT TO 37 C.F.R. § 42.70(a)**

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order (Paper 11) entered February 2, 2016, Patent Owner DIRTT Environmental Solutions Ltd. ("Patent Owner") hereby requests an oral hearing on the issues set forth below at a time to be set by the Board. Oral argument is currently scheduled for October 13, 2016. (Paper 11.)

Patent Owner requests a two-hour hearing, with one hour allotted each to Petitioner and Patent Owner. Patent Owner requests oral argument on the following issues raised in the parties' filings:

1. Whether Petitioner has met its burden to prove that claims 1, 6, 7, and 15-18 are unpatentable for obviousness in view of Raith and EVH and that claim 14 is unpatentable for obviousness in view of Raith, EVH, and Dixon, and particularly (1) whether the motivations/reasons identified by Petitioner would have led a person of ordinary skill in the art at the time of the invention to arrive at the combination recited in independent claim 1 and (2) whether, in light of all of the evidence including the testimony of Patent Owner's expert and the objective evidence of non-obviousness, the subject matter of independent claim 1 would have been obvious to a person of ordinary skill in the art at the time of the invention.

2. Whether Petitioner has met its burden to prove that claims 1, 4, 5, and 9 are unpatentable for obviousness in view of Raith and Yu, and particularly (1)

whether the motivations/reasons identified by Petitioner would have led a person of ordinary skill in the art at the time of the invention to arrive at the combination recited in independent claim 1 and (2) whether, in light of all of the evidence including the testimony of Patent Owner's expert and the objective evidence of non-obviousness, the subject matter of independent claim 1 would have been obvious to a person of ordinary skill in the art at the time of the invention.

3. Whether Petitioner has met its burden to prove that claims 1, 4, 10, 19, and 20 are unpatentable for obviousness in view of Raith and MacGregor, and that claim 25 is unpatentable for obviousness in view of Raith, MacGregor, and Rozier, particularly (1) whether the motivations/reasons identified by Petitioner would have led a person of ordinary skill in the art at the time of the invention to arrive at the combination recited in independent claim 1 and (2) whether, in light of all of the evidence including the testimony of Patent Owner's expert and the objective evidence of non-obviousness, the subject matter of independent claim 1 would have been obvious to a person of ordinary skill in the art at the time of the invention.

4. The arguments and characterizations made by Petitioner in its Reply, including Petitioner's mischaracterizations of the testimony of Patent Owner's expert.

5. The broadest reasonable construction of the term “horizontal stringer” in independent claim 1.

6. The admissibility of any evidence that Patent Owner or Petitioner timely moves to exclude.

Dated: September 6, 2016

Respectfully submitted,

By           /Chad E. Nydegger/          

Chad E. Nydegger, Reg. No. 61,020

Michael J. Frodsham, Reg. No. 48,699

David R. Todd, Reg. No. 41,348

WORKMAN NYDEGGER

60 East South Temple, Suite 1000

Salt Lake City, UT 84111

Telephone: 801-533-9800

Facsimile: 801-328-1707

Attorneys for Patent Owner

## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6, I hereby certify that on this 6th day of September, 2016, I caused the foregoing **Patent Owner's Request for Oral Argument Pursuant to C.F.R. § 42.70(a)** to be served by electronic mail on the following counsel of record for Petitioner:

Victor P. Jonas  
Nicholas M. Anderson  
Timothy Sullivan  
FAEGRE BAKER DANIELS  
2200 Wells Fargo Center  
90 S. Seventh St.  
Minneapolis, MN 55402  
victor.jonas@faegrebd.com  
nick.anderson@faegrebd.com  
timothy.sullivan@faegrebd.com

Trevor Carter  
FAEGRE BAKER DANIELS  
300 N. Meridian Street, Suite 2700  
Indianapolis, IN 46204  
trevor.carter@faegrebd.com

/Chad E. Nydegger/  
Chad E. Nydegger, Reg. No. 61,020