

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

H&S MANUFACTURING COMPANY, INC.

Petitioner,

v.

OXBO INTERNATIONAL CORPORATION

Patent Owner.

Case No.: IPR2016-00950

U.S. Patent No. 8,166,739

PETITIONER'S REQUEST FOR ORAL HEARING

PURSUANT TO 37 C.F.R. § 42.70(a)

In accordance with 37 C.F.R. § 42.70(a), Petitioner H&S Manufacturing Company, Inc. respectfully requests oral argument for all of the issues remaining in this Inter Partes Review. Oral argument is currently scheduled for Tuesday, August 1, 2017.

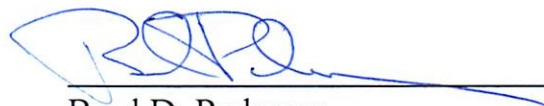
Petitioner submits that one-half hour of oral argument is appropriate to address the following issues:

- (i) Patentee's proposed claim constructions of "windrow merger," "pickup assembly," and "material" are not BRI constructions;
- (ii) Patentee's expert testimony is flawed because it is based on wrong claim constructions and because it is inconsistent;
- (iii) The reasoned rationale for combining the references supports a finding of obviousness based on the interchangeability of farm implement components and functions, and the limited number of available solutions involving mechanical rearrangements of known components as a product of ordinary skill and common sense in response to known advantages and market forces.

Petitioner requests permission to use audio/visual equipment to display demonstrative exhibits, including a projector and screen for Power Point slides.

Dated: June 23, 2017

Respectfully submitted,



Brad D. Pedersen
Reg. No. 32,432

Attorney for Petitioner

Certificate of Service

I hereby certify that on June 23, 2017, a copy of the foregoing was electronically served on patent owner at the following addresses:

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