

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REACTIVE SURFACES LTD. LLP,

Petitioner,

v.

TOYOTA MOTOR CORPORATION,

Patent Owner.

Case IPR2016-01914

Patent No. 8,394,618 B2

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's March 23, 2017

Scheduling Order (Paper 27),¹ Patent Owner Toyota Motor Corporation

respectfully requests oral argument in this *inter partes* review, currently scheduled on January 9, 2018. Patent Owner requests oral argument on all issues raised in the parties' filings, including:

1. Whether Petitioner has carried its burden to prove that claims 1-11 of U.S. Patent No. 8,394,618 B2 are unpatentable based on the grounds on which this *inter partes* review was instituted;
2. Any issues specified by Petitioner in its Request for Oral Argument, if it chooses to file such;
3. Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed, such as Motions to Exclude or Motions for Observations on Cross Examination; and
4. Any other issues that the Board deems necessary for issuing a final written decision.

¹ Although the parties have modified DUE DATE 4 pursuant to a joint stipulation, *see* Paper 35, the Scheduling Order provides that, notwithstanding any such stipulation, "any request for oral argument should be filed by original DUE DATE 4 [November 14, 2017] as set forth in the DUE DATE APPENDIX." Paper 27 at 2, 6.

Patent Owner requests that each side be allowed 30-45 minutes in which to present its arguments.

Patent Owner requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector to be connected to a laptop and a screen for said projector.

Dated: November 14, 2017

/s/ Joshua A. Lorentz

Joshua A. Lorentz

Reg. No. 52,406

Dinsmore & Shohl LLP

255 E. Fifth St., Ste. 1900

Cincinnati, OH 45202

T: (513) 977-8200

E: joshua.lorentz@dinsmore.com

Attorney for Patent Owner

Toyota Motor Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was served on November 14, 2017 by email on the following counsel of record for Petitioner:

David O. Simmons (dsimmons@ivcpatentagency.com)

Jonathan D. Hurt (jhurt@technologylitigators.com)

Mark A.J. Fassold (mfassold@wattsguerra.com)

Jorge Mares (jmares@wattsguerra.com)

Dated: November 14, 2017

/s/ Joshua A. Lorentz

Joshua A. Lorentz

Reg. No. 52,406

Attorney for Patent Owner

Toyota Motor Corporation