

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

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70, Petitioner hereby respectfully request oral argument in the present *inter partes* review proceedings. As set forth in its Scheduling Order, the Board in these proceedings has currently scheduled the oral hearing for January 9, 2018. Petitioner specifies that the issues to which its arguments can be made include:

- Unpatentability of Claims 1-11 under 35 U.S.C. § 103 on the basis of Van Antwerp (Ex. 1006);
- Unpatentability of Claims 1-11 under 35 U.S.C. § 103 on the basis of Schneider (Ex. 1004);
- Unpatentability of Claims 1-11 under 35 U.S.C. § 103 on the basis of Drevon (Ex. 1003);
- Construction and broadest reasonable interpretation to be given to disputed claim terms;
- Issues raised in Patent Owner's Response;
- Issues raised in Patent Owner's Sur-reply;
- Issues specified by Patent Owner in its request for oral argument;
- Rebuttal to Patent Owner's oral arguments on all matters; and
- Any other issue briefed or presented by the parties throughout these proceedings.

Petitioner requests 45 minutes of time for Petitioner's oral argument and rebuttal in this proceeding. Petitioner proposes that it present its arguments first (estimated 30 minutes of requested 45 minutes), Patent Owner follow with its arguments, and that Petitioner use its remaining time for rebuttal (balance of requested 45 minutes). Additionally, Petitioner requests permission to use visual equipment to display PowerPoint demonstrative slides.

Dated: November 16, 2017

Respectfully submitted,

By: /s/ David O. Simmons
David O. Simmons, Reg. No. 43,124
Lead Counsel

Email: dsimmons@ivcpatentagency.com

Counsel for Petitioner, Reactive
Surfaces Ltd., LLP

CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4)(i) and 42.105(b), the undersigned hereby certifies that a copy of this **PETITIONER'S REQUEST FOR ORAL ARGUMENT** for *inter partes* review of U.S. Patent No. 8,394,618 B2 was served on November 16, 2017 by email on the following counsel of record for Patent Owner:

Joshua A. Lorenz (joshua.lorenz@dinsmore.com)

Richard H. Schabowsky (richard.schabowsky@dinsmore.com)

John D. Luken (john.luken@dinsmore.com)

Oleg Khariton (oleg.khariton@dinsmore.com)

/s/ David O. Simmons

David O. Simmons, Reg. No. 43,124
Lead Counsel

Email: dsimmons@ivcpatentagency.com

Counsel for Petitioner, Reactive
Surfaces Ltd., LLP