

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**BAYERISCHE MOTOREN WERKE AKTIENGESELLSCHAFT & BMW
OF NORTH AMERICA, LLC,**
Petitioners

v.

PAICE LLC & THE ABELL FOUNDATION, INC.
Patent Owners

Inter Partes Review No.: IPR2020-00994

U.S. Patent No. 7,104,347 K2

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's Scheduling Order dated November 19, 2020 (Paper 20), Petitioners Bayerische Motoren Werke Aktiengesellschaft & BMW of North America, LLC ("BMW") respectfully request oral argument in the above-identified proceeding, currently scheduled for August 25, 2021 (Paper 30 at 2).

Pursuant to 37 C.F.R. § 42.70(a), and without waiving the right to raise any additional issues not listed below, BMW requests an oral hearing on the following issues:

1. Any issues raised in BMW's Petition and Reply, including whether claims 2, 11, 17, 24, 33, and 38 of U.S. Patent No. 7,104,347 are unpatentable over one or more of Grounds 1a, 1b, 1c, 2a, 2b, 2c, 3a, 3b, 4a, 4b, and 4c;
2. Any issues raised in the Board's Institution Decision (Paper 19);
3. Any issues raised by Patent Owners Paice LLC and The Abell Foundation, Inc. ("Paice") in these proceedings, including the Patent Owner Response and Patent Owner Sur-Reply in this proceeding;
4. Any other issues raised by BMW, Paice, or the Board during these proceedings;
5. Any Motions to Exclude Evidence filed by BMW or Paice;
6. Any other motions or filings pending before this Board;
7. Any additional issues raised by Paice in its Request for Oral Argument;

and

8. Any additional issues raised by this Board or Paice at oral argument.

BMW requests that each side have 60 minutes for oral argument.

Respectfully submitted,

Dated: July 8, 2021

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Certificate of Service

Pursuant to 37 C.F.R. § 42.6(e)(4), I certify that the foregoing Petitioners' Request for Oral Argument was served on July 8, 2021 via electronic mail on the following counsel of record for Patent Owners:

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