

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

**PAICE LLC & THE ABELL FOUNDATION, INC.**  
Patent Owners

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*Inter Partes* Review No.: IPR2020-01299

U.S. Patent No. 8,630,761

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**PETITIONERS' REQUEST FOR ORAL ARGUMENT**

Pursuant to the Board's Scheduling Order dated January 15, 2021 (Paper 11), Petitioners Bayerische Motoren Werke Aktiengesellschaft & BMW of North America, LLC ("BMW") respectfully request oral argument in the above-identified proceeding, currently scheduled for October 19, 2021.

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 1-12 of U.S. Patent No. 8,630,761 are unpatentable over one or more of Grounds 1-3;
2. Any issues raised in the Board's Institution Decision (Paper 10);
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: September 1, 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 September 1, 2021 via electronic mail on the following counsel of record for Patent Owners:

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