

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 and BMW OF  
NORTH AMERICA, LLC,  
Petitioners,

v.

PAICE LLC and THE ABELL FOUNDATION, INC.,  
Patent Owners.

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Case IPR2020-01386  
Patent 7,237,634

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**PATENT OWNERS' REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70(a) and the Scheduling Order (Paper 14), Paice LLC and the Abell Foundation, Inc. (Patent Owners) submit this Request for Oral Argument on all of the instituted grounds of unpatentability of U.S. Patent No. 7,237,634. Patent Owners request (without waiving consideration of any issue not listed below) to address the grounds on which the IPR was instituted and any additional issues on which the Board seeks clarification. Patent Owners request 60 minutes for each side to present arguments collectively for this proceeding. Due to the substantial overlap in issues and prior art, Patent Owners respectfully request that the Board refrain from issuing its Final Written Decision in IPR2020-00994 until after the oral argument in this proceeding.

To the extent the oral argument, which will be held November 9, 2021, is scheduled as an in-person hearing, Patent Owners request to use video equipment to display exhibits, including the use of a projector/screen for a PowerPoint display or the like.

Respectfully submitted,

Dated: September 7, 2021

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## CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on September 7, 2021, a complete and entire copy of this Patent Owner's Request for Oral Argument was provided via email, to the Petitioner by serving the email correspondence addresses of record as follows:

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