

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC., MAZDA MOTOR
OF AMERICA, INC., SUBARU OF AMERICA, INC., and
VOLVO CAR USA, LLC,¹
Petitioner

v.

STRATOSAUDIO, INC.
Patent Owner

Case IPR2021-00716
U.S. Patent No. 8,688,028

**PETITIONER VOLKSWAGEN GROUP OF AMERICA, INC.’S REQUEST
FOR ORAL ARGUMENT**

Mail Stop “Patent Board”
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

¹ Mazda Motor of America, Inc., Subaru of America, Inc., and Volvo Car USA, LLC filed a motion for joinder and a petition in Case IPR2022-00204, which were granted, and, therefore, have been joined as petitioners in this proceeding.

Pursuant to 37 C.F.R. § 42.70 and the Board's October 25, 2021 Scheduling Order (Paper 17), Petitioner Volkswagen Group of America, Inc. ("Petitioner") respectfully requests oral argument, which is currently scheduled for July 21, 2022. Petitioner believes that one hour is an appropriate argument time for each side at the oral hearing in this case.

Petitioner specifies the following issues to be argued:

- The unpatentability of claims 11, 14-16, and 18 of U.S. Patent No. 8,688,028 ("the '028 patent") as anticipated by Takahisa;
- The unpatentability of claims 11, 14-16, and 18 of the '028 patent as obvious over Mackintosh;
- Any issues identified in Patent Owner's Request for Oral Argument;
- Rebuttal to Patent Owner's presentation on all matters;
- Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed, such as any Motions to Exclude and Oppositions to Motions to Exclude; and
- Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Petitioner recognizes that circumstances may require a telephonic hearing in light of the ongoing COVID-19 pandemic, subject to the Board's guidance. If the oral argument will be live, Petitioner asks that it be held at **USPTO headquarters in Alexandria, Virginia**, since Petitioner's counsel is located in Washington DC. If the hearing is conducted live, Petitioner also requests the ability to use audio-visual equipment to display possible demonstratives and exhibits, including the use of an ELMO, computer, projector, and screen.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Ryan C. Richardson, Reg. No. 67,254/

Ryan C. Richardson
Registration No. 67,254
Counsel for Petitioner

Date: June 13, 2022

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **PETITIONER VOLKSWAGEN GROUP OF AMERICA, INC.'S REQUEST FOR ORAL ARGUMENT** was served electronically via e-mail on June 13, 2022, in its entirety on the following parties:

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Respectfully submitted,

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