

IPR2021-01267
U.S. Patent No. 8,166,081

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR AMERICA,
Petitioner

v.

STRATOSAUDIO, INC.,
Patent Owner

IPR2021-01267
U.S. Patent No. 8,166,081

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)**

Pursuant to 37 C.F.R. § 42.70(a) and the Board's Scheduling Order dated January 26, 2022 (Paper 10), Patent Owner StratosAudio, Inc. ("Patent Owner") hereby submits this Request for Oral Argument on issues relating to the patentability of claims 9-11, 15, and 23 of U.S. Patent No. 8,166,081. Patent Owner intends to discuss the issues raised in the parties' filings under the ongoing review, including but not limited to, the following:

1. Any issues properly raised by Petitioner Hyundai Motor America ("Petitioner"), including in the Petition and Petitioner's Reply, and any exhibits relied on therein;
2. Any issues raised by the Board's Institution Decision dated January 25, 2022 (Paper 9);
3. Any issues addressed in Patent Owner's papers, including in Patent Owner's Response and Patent Owner's Sur-Reply, and any exhibits relied on therein; and
4. Any issues addressed in any additional briefing granted by the Board and any exhibits relied on therein.

Patent Owner requests the ability to reserve a portion of its total time for presenting sur-rebuttal arguments after Petitioner's rebuttal. *See* November 2019 Consolidated Trial Practice Guide at 83.

Patent Owner believes the parties should be allotted one (1) hour per side to present arguments.

Health and safety conditions permitting, Patent Owner further requests an in-person hearing in Alexandria, Virginia.

Dated: September 13, 2022

Respectfully submitted,

/John Scheibeler/(electronically signed)

John Scheibeler
Reg. No. 35,346

WHITE & CASE LLP

John Scheibeler, Reg. No. 35,346
White & Case LLP
1221 Avenue of the Americas
New York, NY 10020-1095
Phone: 212-819-8200

Jonathan Lamberson, Reg. No. 57,352
Back-Up Counsel
White & Case LLP
2 Palo Alto Square, Suite 900
3000 El Camino Real
Palo Alto, California 94306-2109
Phone: 650-213-0384

Hallie Kiernan (*pro hac vice*)
Back-Up Counsel
White & Case LLP
1221 Avenue of the Americas
New York, NY 10020-1095
Phone: 212-819-8200

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Request for Oral Argument Pursuant to 37 C.F.R. § 42.70(a) was served on September 13, 2022, by filing this document through the PTAB E2E System, as well as delivering a copy via electronic mail upon the following attorneys of record for Petitioner:

Ryan Yagura (Reg. No. 47,191)
Nicholas J. Whilt (Reg. No. 72,081)
Caitlin P. Hogan (Reg. No. 61,515)
Clarence A. Rowland (Reg. No. 73,775)
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
(213) 430-6000
ryagura@omm.com
nwhilt@omm.com
chogan@omm.com
crowland@omm.com
StratosAudioHyundaiOMM@omm.com

Respectfully submitted,

/John Scheibeler/ (electronically signed)

John Scheibeler
Reg. No. 35,346