

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ASSA ABLOY AB, ASSA ABLOY INC., ASSA ABLOY RESIDENTIAL
GROUP, INC., AUGUST HOME, INC., HID GLOBAL CORPORATION,
ASSA ABLOY GLOBAL SOLUTIONS, INC.,
Petitioners,

v.

CPC PATENT TECHNOLOGIES PTY LTD.,
Patent Owner.

Case No. IPR2022-01045
Patent No. 9,269,208

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order of January 3, 2023 (Paper 22) as modified by the Board’s Revised Scheduling Order of June 12, 2023 (Paper 31) (the “Scheduling Order”), Petitioners ASSA ABLOY AB, ASSA ABLOY Inc., ASSA ABLOY Residential Group, Inc., August Home, Inc., HID Global Corporation, ASSA ABLOY Global Solutions, Inc., (“Petitioners”) respectfully requests oral argument in connection with this proceeding (IPR2022-01045). Per the Scheduling Order, the oral argument will take place on September 28, 2023.

Petitioners propose holding the hearing virtually. However, if the Board is allowing in-person hearings, Petitioners further request the hearing take place in the USPTO’s Alexandria, Virginia location.

In light of the fact that this hearing will address the unpatentability of two patents across three IPR Petitions, Petitioners request ninety (90) minutes in which to present its arguments for all three IPR proceedings (IPR2022-01006; IPR2022-01045; and IPR2022-01089).

To comply with 37 C.F.R. § 42.70(a)’s requirement that this request “must specify the issues to be argued,” and without waiving argument on any issue not specifically identified below, Petitioners specify at least the following issues to be argued:

- That per 35 U.S.C. § 103, claims 1, 3-5, and 9 of U.S. Patent No. 9,269,208 are unpatentable as obvious over Bianco in view of Mathiassen;
- That per 35 U.S.C. § 103, claims 2 and 6-7 of U.S. Patent No. 9,269,208 are unpatentable as obvious over Bianco in view of Mathiassen and further in view of Houvener;
- That per 35 U.S.C. § 103, claim 8 of U.S. Patent No. 9,269,208 is unpatentable as obvious over Bianco in view of Mathiassen and further in view of Houvener and Richmond;
- Any claim constructions, unpatentability grounds, or other issues raised in the Petition or Petitioner Reply, the Patent Owner Preliminary Response, the Patent Owner Response, the Patent Owner Sur-Reply, or the Board's Institution Decision;
- Rebuttal to issues raised by Patent Owner;
- Any other motions filed by either party; and
- Any other issues that the Board deems necessary for issuing a final written decision in this proceeding.

Dated: July 18, 2023

Respectfully Submitted,

/ Dion M. Bregman /

Dion M. Bregman, Reg. No. 45,645

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), it is hereby certified that on July 18, 2023 an electronic copy of this PETITIONER’S REQUEST FOR ORAL ARGUMENT, was served via email to Patent Owner’s counsel of record in this proceeding:

Andrew C. Ryan (ryan@cantorcolburn.com)
Steven M Coyle (scoyle@cantorcolburn.com)
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Dated: July 18, 2023

/ Dion M. Bregman /

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