

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.,
Petitioner,

v.

CPC PATENT TECHNOLOGIES PTY LTD.,
Patent Owner.

Case IPR2022-01089
Patent 9,269,208

PATENT OWNER'S 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”), Patent Owner CPC Patent Technologies Pty Ltd. (“Patent Owner”) respectfully requests oral argument in connection with this proceeding (IPR2022-01089). Per the Scheduling Order, the oral argument will take place on September 28, 2023.

Patent Owner proposes holding the hearing virtually. However, if the hearing is held in-person hearings, Patent Owner requests the hearing take place in Alexandria, Virginia.

Notwithstanding that the hearing will involve two patents across three proceedings, the relevant issues are common to all three proceedings. For example, all three of the proceedings involve the same limited number of claim elements, the same asserted prior art combination, and the same claim construction disputes. Patent Owner therefore requests forty-five (45) minutes for each side’s arguments for the combined, concurrent hearings for all three IPR proceedings (IPR2022-01006; IPR2022-01045; and IPR2022-01089).

Patent Owner requests, without waiving consideration of any issue not listed below, oral argument to address the following issues:

- Whether Claims 10-13 are rendered obvious by Bianco and Mathiassen.

- The proper construction of the disputed claim terms.
- Any issues raised by Petitioner in its Request For Oral Argument.
- Rebuttal to issues raised by Petitioner.
- Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision

Patent Owner reserves the right to address any other arguments presented by Petitioner and any other issues about which the Board wishes to hear argument.

Respectfully submitted,

Dated: July 20, 2023

By: /Andrew C. Ryan/
Andrew C. Ryan
Reg. No. 43,070
Steven M. Coyle (*pro hac vice*)
CANTOR COLBURN LLP
20 Church Street, 22nd Floor
Hartford, CT 06103
Tel: (860) 286-2929
Fax: (860) 286-0115
ryan@cantorcolburn.com
scoyle@cantorcolburn.com

*Attorneys for Patent Owner
CPC Patent Technologies Pty Ltd.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on this 20th day of July, 2023, service of the foregoing document was made on the counsel of record for the Petitioner by filing this document through the PTAB’s P-TACTS platform as well as delivering a copy via electronic mail to the following address:

Dion Bregman
Andrew Devkar
James J. Kritsas
Morgan, Lewis & Bockius LLP
1400 Page Mill Road
Palo Alto, CA 94304
HID-IPRs@morganlewis.com

Dated: July 20, 2023

By: /Andrew C. Ryan/
Andrew C. Ryan
Reg. No. 43,070