

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, and ASSA ABLOY Global Solutions, Inc.,
Petitioners,

v.

CPC Patent Technologies PTY LTD.,
Patent Owner.

Case No. IPR2022-01093
Patent No. 8,620,039

PETITIONERS' REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order of February 2, 2023 (Paper 21) as modified by the Board’s Revised Scheduling Order of September 8, 2023 (Paper 29) (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 (IPR2022-01093). Per the Scheduling Order, the oral argument will take place on November 9, 2023.

Petitioners request that oral argument be held virtually by videoconference.

Petitioners request sixty (60) minutes in which to present its arguments for both of the consolidated IPR proceedings (IPR2022-01093 and IPR2022-01094).

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 with respect to both IPR2022-01093 and IPR2022-01094:

- That per 35 U.S.C. § 103, claims 1, 2, 13, 14, 19, and 20 of U.S.

Patent No. 8,620,039 are unpatentable as obvious over Hsu in view of Sanford;

- That per 35 U.S.C. § 103, claims 1, 2, 13, 14, 19, and 20 of U.S. Patent No. 8,620,039 are unpatentable as obvious over Hsu in view of Sanford and Tsukamura;
- That per 35 U.S.C. § 103, claims 3, 4, 6-11, 15, 16, and 18 of U.S. Patent No. 8,620,039 are unpatentable as obvious over Sanford in view of Hsu;
- That per 35 U.S.C. § 103, claims 3, 4, 6-11, 15, 16, and 18 of U.S. Patent No. 8,620,039 are unpatentable as obvious over Sanford in view of Hsu and Tsukamura;
- That per 35 U.S.C. § 103, claim 5 of U.S. Patent No. 8,620,039 is unpatentable as obvious over Sanford in view of Hsu and Leu;
- That per 35 U.S.C. § 103, claim 5 of U.S. Patent No. 8,620,039 is unpatentable as obvious over Sanford in view of Hsu, Tsukamura, and Leu;
- That per 35 U.S.C. § 103, claim 12 of U.S. Patent No. 8,620,039 is unpatentable as obvious over Sanford in view of Hsu and Houvener;
- That per 35 U.S.C. § 103, claim 12 of U.S. Patent No. 8,620,039 is unpatentable as obvious over Sanford in view of Hsu, Tsukamura, and Houvener;

- That per 35 U.S.C. § 103, claim 17 of U.S. Patent No. 8,620,039 is unpatentable as obvious over Sanford in view of Hsu and McCalley;
- That per 35 U.S.C. § 103, claim 17 of U.S. Patent No. 8,620,039 is unpatentable as obvious over Sanford in view of Hsu, Tsukamura, and McCalley;
- 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: September 14, 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
September 14, 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)
Nicholas A. Geiger (ngeiger@cantorcolburn.com)

Dated: September 14, 2023 / Dion M. Bregman /
Dion M. Bregman