

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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.

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Case IPR2022-01094  
Patent 8,620,039

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Pursuant to 37 C.F.R. § 42.70 and the Board’s Scheduling Order of February 2, 2023 (Paper 20), Patent Owner CPC Patent Technologies Pty Ltd. (“Patent Owner”) respectfully requests oral argument in connection with this proceeding (IPR2022-01094). Per the Board’s Amended Scheduling Order (Paper 28), the oral argument will take place on November 9, 2023.

Patent Owner proposes holding the hearing virtually.

The hearing will involve two IPR proceedings directed to the same patent. The relevant issues are common to both proceedings. In particular, both 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 both proceedings (IPR2022-01093, -01094).

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

- Whether Claims 3-4, 6-11, 15-16, and 18 are rendered obvious by Sanford and Hsu.
- Whether Claims 3-4, 6-11, 15-16, and 18 are rendered obvious by Sanford, Hsu, and Tsukamura.
- Whether Claim 5 is rendered obvious by Sanford, Hsu and Leu.
- Whether Claim 5 is rendered obvious by Sanford, Hsu, Tsukamura, and Leu.

- Whether Claim 12 is rendered obvious by Sanford, Hsu, and Houvener.
- Whether Claim 12 is rendered obvious by Sanford, Hsu, Tsukamura, and Houvener.
- Whether Claim 17 is rendered obvious by Sanford, Hsu, and McCalley.
- Whether Claim 17 is rendered obvious by Sanford, Hsu, Tsukamura, and McCalley.
- 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: September 14, 2023

By: /Andrew C. Ryan/  
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## CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on this 14th day of September, 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:

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Dated: September 14, 2023

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