

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
FORD MOTOR COMPANY, GENERAL MOTORS LLC,
NISSAN NORTH AMERICA, INC., TESLA, INC., and
AMERICAN HONDA MOTOR CO., INC.,¹
Petitioner

v.

NEO WIRELESS LLC,
Patent Owner

Case IPR2022-01539
U.S. Patent No. 10,965,512

**PETITIONER VOLKSWAGEN GROUP OF AMERICA, INC.'S
REQUEST FOR ORAL ARGUMENT**

Mail Stop "PATENT BOARD"

Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

¹ Ford Motor Company filed a motion for joinder and a petition in IPR2023-00764, and General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., filed their own motion for joinder and petition in IPR2023-00961. Both motions were granted, and, therefore, Ford Motor Company, General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., have been joined as petitioners in this proceeding.

Pursuant to the Board's May 5, 2023 Scheduling Order (Paper 8), Petitioner respectfully requests oral argument. Pursuant to the Board's November 20, 2023 Order (Paper 34), the parties have agreed to present their oral arguments for this proceeding on February 2, 2024.² Petitioner requests one hour in which to present its arguments. Under 37 C.F.R. § 42.70, and without intending to waive any issue not specifically identified, Petitioner specifies the following issues to be argued:

1. Whether claims 1-30 of U.S. Patent No. 10,965,512 ("the '512 patent") are unpatentable under 35 U.S.C. § 103(a) over Kim and Tong;
2. Whether claims 1, 3, 4, 6–8, 10, 11, 13–15, 17, 18, 20, 22, 23, 25, 26, 28, and 30 of the '512 patent are unpatentable under 35 U.S.C. § 103(a) over Ketchum and Li;
3. Whether claims 5, 12, 21, and 29 of the '512 patent are unpatentable under 35 U.S.C. § 103(a) over Ketchum, Li, and Smee;
4. Any issues specified by Patent Owner in its Request for Oral Argument; and
5. Any other issues the Board deems necessary for issuing a final written decision (e.g., any motion to exclude evidence and any motion to seal evidence).

² The parties have further agreed to present the oral arguments for IPR2022-01537 and IPR2022-01567 on February 1, 2024.

Petitioner also requests that the Board provide audio-visual equipment to display demonstrative exhibits, including a projector and screen for displaying documents from a computer.

Further, Petitioner requests that the hearing be held at the USPTO's Alexandria, Virginia office because that location will be more convenient, have simpler logistics, and be less costly for Petitioner. Petitioner notes that its counsel are located in the Washington, DC area.

Respectfully submitted,

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Date: December 21, 2023

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served in its entirety on December 21, 2023 upon the following parties via electronic mail:

Counsel for Patent Owner

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