

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Arkema France

Petitioner

v.

Honeywell International Inc.

Patent Owner

Trial No.: IPR2015-00916

U.S. Patent No. 8,710,282

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70(a), and the Scheduling Order entered October 21, 2015 (Paper 17, p. 6), Petitioner respectfully requests the oral argument as scheduled for July 18, 2016. Petitioner requests that the hearing remain open to the public and opposes Patent Owner's request to make any portion of the oral hearing closed to the public. *See LG Electronics, Inc. v. ATI Technologies ULC*, IPR2015-00325, Paper 51 (P.T.A.B. Jan. 22, 2016).

Petitioner requests that each side be given 60 minutes of oral argument. Petitioner requests the ability to use audio/visual equipment to display demonstrative exhibits, including the use of a projector and screen.

Without intending to waive any issue not specifically identified, Petitioner identifies below the issues to be argued:

- The grounds of unpatentability instituted in IPR2015-00916 (*see* Paper 16, p. 17):
 - Claims 1-20 of U.S. Patent No. 8,710,282 (the '282 patent) as being obvious under 35 U.S.C. § 103(a) over Smith, Masayuki, and Harrison.
- Whether Smith (EX1003) is prior art to the '282 patent.
 - Whether Patent Owner showed continuous diligence in constructively reducing to practice the subject matter of claims 1-20.

- The content of Petitioner's Petition and Reply.
- Any additional issues raised by the Patent Owner during oral argument.
- Petitioner's Motion to Exclude.

Dated: June 13, 2016

Respectfully submitted,

/Jon Beaupré/

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing PETITIONER'S
REQUEST FOR ORAL ARGUMENT has been served in its entirety this 13th day
of June, 2016 by electronic mail on:

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