

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA

Petitioner

v.

CARUCEL INVESTMENTS, L.P.

Patent Owner

Case No. IPR2019-01102

U.S. Patent No. 7,848,701

**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT
UNDER 37 C.F.R. § 42.70(a)**

Pursuant to the Scheduling Order (Paper No. 8), as modified by the Revised Scheduling Order (Paper No. 17), Patent Owner respectfully requests oral argument under 37 C.F.R. § 47.70(a). Should the hearing be held in person, Patent Owner requests use of the audio/visual system, including the capability of attaching a laptop computer, projector and screen, with monitor connectivity, as well as the use of the ELMO in the hearing room. Patent Owner additionally respectfully requests oral argument by video conference from the USPTO Texas Regional Office if the Panel holds the hearing other than by telephone or in person. Additionally, Patent Owner will rely on the Board's guidance and preference regarding whether to conduct a hearing for each individual IPR per Petitioner or whether to allocate a time "per side" for the hearing.

Patent Owner requests oral argument on the following issues:

- (1) All issues instituted by the Board in the instant IPR;
- (2) All issues raised by Petitioner either in its Petition or oral argument; and
- (3) All issues raised by Patent Owner in its Response and Preliminary Response.

Date: July 22, 2020

Respectfully submitted,

/s/ R. Scott Rhoades

R. Scott Rhoades

Reg. No. 44,300

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e), the undersigned certifies that an electronic copy of the foregoing PATENT OWNER'S REQUEST FOR ORAL ARGUMENT UNDER 37 C.F.R. § 42.70(a) was served on the Petitioners by electronic mail on July 22, 2020:

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Respectfully submitted,

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