

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner

v.

CARUCEL INVESTMENTS, L.P.,
Patent Owner

Case IPR2019-01102
U.S. Patent No. 7,848,701

PETITIONER'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

Pursuant to 37 C.F.R. § 42.70 and the Board's November 14, 2019

Scheduling Order (Paper 8) and April 7, 2020 Revised Scheduling Order (Paper 17), Petitioner Volkswagen Group of America, Inc. ("Petitioner") respectfully requests oral argument, which is currently scheduled for September 2, 2020.

Because this hearing has been consolidated with IPR2019-01101, IPR2019-01103, IPR2019-01105, and IPR2019-01079, each involving related patents, Petitioner has met and conferred with counsel for Patent Owner Carucel Investments, L.P. and Petitioner Unified Patents Inc. Pursuant to 37 C.F.R. § 42.70(a), Petitioner requests two (2) hours of time for each side and specifies the following issues, without intent to waive consideration of any issue not requested, to be argued for this proceeding.

Petitioner specifies the following issues to be argued:

- The unpatentability of claims 10, 15-18, 31, and 33-35 as obvious over Ito and Gardner;
- The unpatentability of claims 10, 15-18, 31, and 33-35 as obvious over Gilhousen '865 and Gilhousen '390;
- Any issues identified in Patent Owner's Request for Oral Argument;
- Rebuttal to Patent Owner's presentation on all matters;

- Any other issues raised in papers filed in this proceeding, including issues raised in papers yet to be filed, such as any Motions to Exclude and Oppositions to Motions to Exclude; and
- Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

At this time, Petitioner prefers conducting the oral hearing in-person.

However, Petitioner recognizes that circumstances may require a telephonic hearing in light of the COVID-19 pandemic, subject to the Board's guidance. If the hearing is conducted in-person, Petitioner requests that the hearing occur in the United States Patent and Trademark Office's Alexandria office, and that Petitioner have the ability to use audio-visual equipment to display possible demonstratives and exhibits, including the use of an ELMO, computer, projector, and screen.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

/Ryan C. Richardson/

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Volkswagen Group of America, Inc.

Date: July 22, 2020

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that on July 22, 2020, a true and correct copy of the foregoing **PETITIONER'S REQUEST FOR ORAL ARGUMENT** was served electronically via e-mail in its entirety on the following counsel for Patent Owner:

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