

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner

v.

YECHEZKAL EVAN SPERO,
Patent Owner

Case IPR2022-01586
U.S. Patent No. 11,208,029

**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

Pursuant to the Board's May 24, 2023 Scheduling Order (Paper 8),
Petitioner Volkswagen Group of America, Inc. ("Petitioner") respectfully requests
oral argument, currently scheduled for February 22, 2024. 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 1-33 of U.S. Patent No. 11,208,029 ("the '029 Patent")
are unpatentable under 35 U.S.C § 103(a) over Beam and Kobayashi;
2. Whether claims 1-33 of the '029 Patent are unpatentable under 35 U.S.C
§ 103(a) over Gotou and Karlsson;
3. Any issues specified by Patent Owner in its Request for Oral Argument;
and
4. 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).

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 in-person at the USPTO's Alexandria, Virginia office because that location will be more convenient, have simpler logistics, and be most cost-efficient for Petitioner. Petitioner notes that its counsel are located in the Washington, DC area.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

Jason A. Fitzsimmons
Registration No. 65,367
Attorney for Petitioner

Date: January 10, 2024

1101 K Street, NW, 10th Floor
Washington, DC 20005
(202) 371-2600

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 January 10, 2024, upon the following parties via electronic mail:

Sangeeta G. Shah (Lead Counsel)
David S. Bir (Back-up Counsel)
Andrew B. Turner (Back-up Counsel)
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Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Jason A. Fitzsimmons/

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