

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GARMIN INTERNATIONAL, INC.
Petitioner

v.

Patent of CUOZZO SPEED TECHNOLOGIES LLC
Patent Owner

Case IPR2012-00001
Patent 6,778,074

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's January 9, 2013, Scheduling Order (Paper 16), Petitioner, Garmin International, Inc., respectfully requests oral argument for the trial currently scheduled on August 16, 2013. Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- I. The Proper Claim Construction of "Integrally Attached."
- II. Cuozzo's Attempt to Swear Behind Aumayer and Awada.
- III. Whether Claims 10, 14, and 17 are Unpatentable Based on the Instituted Rejections.
 - a. Whether each of the elements of claims 10, 14, and 17 are taught or suggested in the asserted prior art.
 - b. Whether there is a reason to combine the asserted prior art.
- IV. Whether Patent Owner's Motion to Amend Should Be Granted.
 - a. Whether substitute claims 21-23 improperly enlarge the scope of the original claims.
 - b. Whether substitute claims 21-23 improperly add new matter.
 - c. Whether substitute claims 21-23 are unpatentable over Nagoshi in view of Vaughn.
 - d. Whether substitute claims 21-22 are unpatentable over Aumayer and Vaughn or Tegethoff and Vaughn.

- e. Whether substitute claim 23 is unpatentable over Aumayer, Nagoshi, and Vaughn or Tegethoff, Nagoshi, and Vaughn.
- f. Whether substitute claims 21-22 are unpatentable over Aumayer, Vaughn, Evans, and Wendt or Tegethoff, Vaughn, Evans, and Wendt.

In the event any fees are required for this Request, please charge Deposit Account No. 19-0522.

Dated: July 12, 2013

Respectfully submitted,

HOVEY WILLIAMS LLP

By: s/ Jennifer C. Bailey

Jennifer C. Bailey, Reg. No. 52,583

Scott R. Brown, Reg. No. 40,535

10801 Mastin Blvd., Suite 1000

Overland Park, KS 66210

P: (913) 647-9050

F: (913) 647-9057

jcb@hoveywilliams.com

srb@hoveywilliams.com

Eric A. Buresh, Reg. No. 53,394

Jason R. Mudd, Reg. No. 57,700

ERISE IP, P.A.

6201 College Blvd., Suite 300

Overland Park, KS 66211

P: (913) 777-5600

F: (913) 777-5601

Eric.Buresh@EriseIP.com

Jason.Mudd@EriseIP.com

ATTORNEYS FOR PETITIONER

(IPR Trial No. 2012-00001)

CERTIFICATE OF SERVICE

I certify that on July 12, 2013, a true and correct copy of *Petitioner's Request for Oral Argument* has been provided, via electronic mail to counsel of record as follows:

John Robert Kasha, Esq.
KASHA LAW LLC

Email: *john.kasha@kashalaw.com*

Cabrach J. Connor
Jason W. Deats
REED & SCARDINO LLP

Email: *cc Connor@reedscardino.com*

Email: *jdeats@reedscardino.com*

David A. Skeels
FRIEDMAN, SUDER & COOKE

Email: *skeels@fsclaw.com*

ATTORNEYS FOR PATENT OWNER, CUOZZO SPEED TECHNOLOGIES LLC

s/ Jennifer C. Bailey
