UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MERCEDES-BENZ USA, LLC And MERCEDES-BENZ U.S. INTERNATIONAL INC. Petitioner,

V.

VELOCITY PATENT, LLC, Patent Owner.

Case IPR2014-01247 Patent 5,954,781

PATENT OWNER'S REQUEST FOR CANCELATION OF CLAIMS 31 AND 32

INTER PARTES REVIEW OF U.S. PATENT NO. 5,954,781

Filed on behalf of Patent Owner:
James A. Shimota (appearing *pro hac vice*)
Howard Levin (Reg. No. 50,480)
Aaron Taggart (*pro hac vice* motion to be filed)
MAVRAKAKIS LAW GROUP LLP
180 North LaSalle Street, Suite 2215
Chicago, IL 60610
Telephone: 312-216-1620

Patrick Richards (Reg. No. 48,905) RICHARDS PATENT LAW, PC. 233 S. Wacker Dr., 84th Floor Chicago, IL 60606 Telephone: 312-283-8555



REQUEST

Pursuant to 37 C.F.R. § 42.73, the Patent Owner respectfully requests the cancelation of claims 31 and 32 of U.S. Patent No. 5,954,781 ("the '781 patent"). Further, as ordered by the Board on December 15, 2014, a copy of the statutory disclaimer for claims 31 and 32 of the '781 patent, which was recorded on December 10, 2014, is attached hereto as Exhibit 2001.

CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests cancelation of claims 31 and 32 of the '781 patent.

Dated: December 29, 2014 Respectfully submitted,

/Patrick D. Richards/

Patrick Richards (Reg. No. 48,905) Richards Patent Law P.C. Willis (Sears) Tower 233 S. Wacker Dr., 84th Floor Chicago, IL 60606 Telephone: (312) 283-8555

Counsel for Patent Owner

