

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,
Petitioner,

v.

VELOCITY PATENT, LLC,
Patent Owner.

Case IPR2015-00276
Patent 5,954,781

**PATENT OWNER'S PRELIMINARY RESPOSE
TO PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 5,954,781**

Filed on behalf of Patent Owner
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