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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, INC.

Petitioner

v.

VELOCITY PATENTS LLC

Patent Owner

IPR2017-01723

U.S. Patent 5,954,781

PETITION FOR *INTER PARTES* REVIEW OF

U.S. PATENT NO. 5,954,781

CHALLENGING CLAIMS 1, 7, 13, 17 and 60

UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104

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I. MANDATORY NOTICES

A. Real Party-in-Interest

Unified Patents, Inc. (“Unified Patents” or “Petitioner”) is the real party-in-interest.

B. Related Matters

U.S. Pat. 5,954,781 (“the ’781 Patent” (Ex. 1001)) is owned by Velocity Patent LLC (“Velocity” or “Patent Owner”). The ’781 patent is the subject of *Velocity Patent LLC v. Audi of America, Inc., et al.*, No. 1:13-cv-08418-JWD (N.D. Ill.), as well as litigation in the Northern District of Illinois against Mercedes-Benz (Case No. 1:13-cv-08413-JWD), BMW (Case No. 1:13-cv-08416), Chrysler (Case No. 1:13-cv-08419-JWD), and Jaguar Land Rover (Case No. 1:13-cv-08421). The ’781 patent was previously the subject of: Reexamination Control No. 90/013,252, and IPRs IPR2014-01247, IPR2015-00276 and IPR2015-00290, each of which has either been completed or terminated.

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II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)-(2), Petitioner challenges claims 1, 7, 13, 17, and 60 of the '781 Patent (the "Challenged Claims").

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