

Filed on behalf of EmeraChem Holdings, LLC

By: Michael J. Bradford
LUEDEKA NEELY GROUP P.C.
900 S. Gay Street, Suite 1871
P. O. Box 1871
Knoxville, Tennessee 37901-1871
Telephone: (865) 546-4305
Facsimile: (865) 523-4478

Jacobus C. Rasser
Marras Amsterdam BV
Beethovenstraat 105 B
1077HX Amsterdam
The Netherlands
Telephone: +31 (0)6 5245 2741

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.
Petitioner

v.

EMERACHEM HOLDINGS, LLC
Patent Owner

Case No. IPR2014-01554
U.S. Patent No. 6,037,307

PATENT OWNER'S LIST OF PROPOSED MOTIONS

IPR2014-01554; Patent 6,037,307
Patent Owner's List of Proposed Motions

The Patent Owner does not at this time anticipate filing any motions other than the motions provided in the Scheduling Order and in the Rules. The Patent Owner will make any request(s) for authorization to file additional motions as the circumstance arises and as permitted by the Board.

Respectfully submitted,

LUEDEKA NEELY GROUP, P.C.

By: /Michael J. Bradford/
Michael J. Bradford
Registration No. 52,646
LUEDEKA NEELY GROUP, P.C.
900 S. Gay Street, Suite 1871
P. O. Box 1871
Knoxville, TN 37901-1871
(865) 546-4305
(865) 523-4478 (Fax)
Attorney for Patent Owner

Dated: April 13, 2015

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Patent Owner's List of Proposed Motions was served on April 13, 2015, by email at ptopatentcommunication@lockelord.com and by causing it to be sent by U.S. Mail to counsel for Petitioner at the following address:

Steven F. Meyer
Seth J. Atlas
Locke Lord LLP
3 World Financial Center - 20th Floor
New York, NY 10281

/Michael J. Bradford/
Michael J. Bradford
Registration No. 52,646
P. O. Box 1871
Knoxville, TN 37901-1871
Attorney for Patent Owner

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