# UNITED STATES PATENT AND TRADEMARK OFFICE ————— BEFORE THE PATENT TRIAL AND APPEAL BOARD —————

ENFORCEMENT VIDEO, LLC

(d/b/a WatchGuard Video)

Petitioner

V.

DIGITAL ALLY, INC.

Patent Owner

Case IPR2017-01401

Patent 9,325,950

PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR *INTER PARTES* REVIEW



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	"a :	first video <i>camera</i> configuredto <i>associate</i> the encoded video with a first	



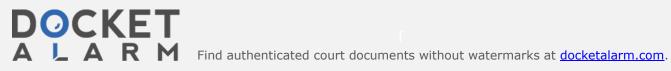
	unique camera identifier" or "a first video cameraconfigured tostamp the				
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#### Cases

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Microsoft Corp. v. Proxyconn, Inc., 789 F.3d 1292 (Fed. Cir. 2015)	9
Phillips v. AWH Corp., 415 F.3d 1303 (Fed. Cir. 2005)	10
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