

**From:** [Day, Evan S. \(SDO\)](#)  
**To:** [Coulson, Chris](#); [Bright, Meghan \(SDO\)](#); [Ng, Chun \(SEA\)](#); [Bernstein, Matthew C. \(SDO\)](#); [Sathe, Vinay \(SDO\)](#); [McKeever, Patrick J. \(SDO\)](#); \*Perkins-Service-MSFT-Bradium-IPR  
**Cc:** [Zachary, Michael](#); [Ulrich, Clifford](#)  
**Subject:** RE: Microsoft Corp. v. Bradium Tech. // IPR2016-00448 - Correspondence  
**Date:** Thursday, February 09, 2017 8:44:33 PM

---

Counsel,

We have received your correspondence today regarding Ex. 1017, and will respond to the issues raised in your letter in a reasonable time. However, with respect to your request that Microsoft “immediately request that Exhibit 1017 be sealed and that the public version of the declaration be expunged,” this request, as made by you, is not reasonable. Obviously we are willing to work with you and are willing to consider sealing the declaration if you actually identify specific confidential information contained in the declaration. Claiming that 10-18 year old information is confidential, without providing any reasons or justification, simply is not reasonable—especially given that Mr. Lavi’s declaration for the most part mirrors topics discussed by Mr. Levanon which he and Bradium claim is public, as well as subject matter that the named inventors have discussed in materials made publicly available at the PTO on several occasions and which Bradium itself has made publicly available in this proceeding. See, e.g. Exs. 2019, 2020. Therefore, please identify the specific paragraphs (or portions thereof) that you claim contain confidential information and the bases therefore, including any agreements upon which your confidentiality assertions are based (with English translations if they are not in English).

Moreover, you state that Mr. Lavi’s declaration reveals “confidential corporate information regarding which we understand Mr. Lavi is subject to confidentiality obligations based on his employment with GACentral.com, 3DVU, Ltd., and 3DVU, Inc.,” not Bradium. As far as we know, your office does not represent any entities in this IPR other than Bradium. Neither you nor your firm have entered an appearance on behalf of any of these entities in this IPR or any other proceeding. Also, to the best that our research has been able to determine, these entities are no longer operational or in good standing legally. The information that we have received through the Delaware litigation also gives no indication that the assignment of the asserted patents to Bradium conveyed any standing to enforce previous confidentiality agreements on behalf of other entities. Please unequivocally state whether your firm represents GACentral.com, 3DVU, Ltd., or 3DVU, Inc., whether you are willing to accept service on their behalf moving forward, and whether these entities legally still exist.

Again, we are willing to consider your request and work with you if you provide the requested information.

Best regards,  
Evan

**Evan Day | Perkins Coie LLP**

11988 El Camino Real Suite 350  
San Diego, CA 92130-2594  
D. +1.858.720.5743  
F. +1.858.720.5799  
E. [EDay@perkinscoie.com](mailto:EDay@perkinscoie.com)

---

**From:** Coulson, Chris [mailto:CCoulson@kenyon.com]  
**Sent:** Thursday, February 09, 2017 2:38 PM  
**To:** Bright, Meghan (SDO); Ng, Chun (SEA); Bernstein, Matthew C. (SDO); Sathe, Vinay (SDO); McKeever, Patrick J. (SDO); Day, Evan S. (SDO); \*Perkins-Service-MSFT-Bradium-IPR  
**Cc:** Zachary, Michael; Ulrich, Clifford  
**Subject:** RE: Microsoft Corp. v. Bradium Tech. // IPR2016-00448 - Correspondence

Counsel,

Please see the attached correspondence.

Best regards,

**Chris Coulson**  
**ANDREWS KURTH KENYON LLP**

Tel: 212.908.6409

---

**From:** Bright, Meghan (Perkins Coie) [<mailto:MBright@perkinscoie.com>]  
**Sent:** Monday, February 06, 2017 9:39 PM  
**To:** Coulson, Chris; Zachary, Michael; Ulrich, Clifford; ~ ~ Bradium v. Microsoft  
**Cc:** Ng, Chun (Perkins Coie); Bernstein, Matthew C. (Perkins Coie); Sathe, Vinay (Perkins Coie); McKeever, Patrick J. (Perkins Coie); Day, Evan S. (Perkins Coie); [PerkinsServiceBradiumIPR@perkinscoie.com](mailto:PerkinsServiceBradiumIPR@perkinscoie.com)  
**Subject:** Microsoft Corp. v. Bradium Tech. // IPR2016-00448 - U.S. Patent No. 7,908,343 // Service of Petitioner's Reply and Related Exhibits

Re: *Inter Partes* Review Case No. IPR2016-00448  
Microsoft Corporation v. Bradium Technologies LLC  
U.S. Patent No. 7,908,343

Counsel:

Attached please find service copies of the following documents filed at the PTAB on February 6, 2017 regarding *inter partes* review Case No. IPR2016-00448:

- Petitioner's Reply to Patent Owner's Response
- Exhibits 1014-1020, 1022-1031 (*to follow via LeapFile Transfer*)

Regards,

**Meghan Bright | Perkins Coie LLP**

PARALEGAL  
11988 El Camino Real Suite 350  
San Diego, CA 92130-2594  
D. +1.858.720.5746  
E. [MBright@perkinscoie.com](mailto:MBright@perkinscoie.com)

---

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

Confidentiality Notice: The information contained in this email and any attachments to it may be legally privileged and include confidential information intended only for the recipient(s) identified above. If you are not one of those intended recipients, you are hereby notified that any dissemination, distribution or copying of this email or its attachments is strictly prohibited. If you have received this email in error, please notify the sender of that fact by return email and permanently delete the email and any attachments to it immediately. Please do not retain, copy or use this email or its attachments for any purpose, nor disclose all or any part of its contents to any other person. Andrews Kurth Kenyon LLP operates as a Texas limited liability partnership. Andrews Kurth (Middle East) DMCC is registered and licensed as a Free Zone company under the rules and regulations of DMCCA. Andrews Kurth Kenyon (UK) LLP is authorized and regulated by the Solicitors Regulation Authority of England and Wales (SRA Registration No.598542). Thank you.