

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MICROSOFT CORPORATION

Petitioner

v.

BRADIUM TECHNOLOGIES LLC

Patent Owner

CASE IPR2016-00448

Patent No. 7,908,343

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**DECLARATION OF DR. PEGGY  
AGOURIS IN SUPPORT OF PATENT  
OWNER RESPONSE PURSUANT TO  
37 C.F.R. § 42.120**

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Exhibit 2003

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## **I. INTRODUCTION**

1. I have been retained by counsel for Bradium Technologies LLC (“Bradium” or “Patent Owner”) as an expert consultant in regards to *inter partes* review proceeding IPR2016-00448 for U.S. Patent No. 7,908,343.

2. In IPR2016-00448, I understand that Petitioner, Microsoft Corporation (“Microsoft” or “Petitioner”) is challenging the validity of Claims 1 through 20 of the ’343 Patent.

3. I understand that the Board instituted an *inter partes* review on the following Ground: Claims 1–20 as obvious under 35 U.S.C. § 103(a) over Reddy in view of Hornbacker. Paper No. 9 (Institution Decision) at 44.

4. I was asked to consider whether the challenged claims of the U.S. Patent No. 7,908,343 (“the ’343 Patent”) (Ex. 1001), which are Claims 1 through 20, would have been obvious to a person of ordinary skill in the art (“POSA”) as of the date of the invention.

### **A. Background and Qualifications**

5. This is a summary of my background and qualifications. I set forth my background in more detail in my Curriculum Vitae which is attached as Appendix A.

6. I am currently Dean of the College of Science at George Mason University. I am additionally the Director of the Center for Earth Observing &

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