

Michalson, PhD., William R.
August 5, 2016

Page 1

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
CASE IPR2015-01432
U.S. PATENT NO. 7,139,792 B2

MICROSOFT CORPORATION, *

Petitioner *

*

vs. *

BRADIUM TECHNOLOGIES, LLC, *

Patent Owner *

DEPOSITION OF: WILLIAM R. MICHALSON, PhD.

CATUOGNO COURT REPORTING SERVICES

255 STATE STREET

Boston, Massachusetts 02110

August 5, 2016

8:47 a.m.

Brenda M. Ginisi

Court Reporter

Exhibit 2043

Bradium Technologies LLC - patent owner

Microsoft Corporation - petitioner

IPR2016-00448

CATUOGNO COURT REPORTING & STENOGRAPHY TRANSCRIPTIONS

Michalson, PhD., William R.
August 5, 2016

Page 2

1 APPEARANCES:

2 Representing Microsoft Corporation:

3 PERKINS COIE

4 11988 El Camino Real, Suite 350

5 San Diego, California 92130

6 BY: EVAN S. DAY, ESQ.

7 (858) 720-5743 FAX: (858) 720-5799

8 E-mail: eday@perkinscoie.com

9 Representing Bradium Technologies, Inc.:

10 KENYON & KENYON LLP

11 One Broadway

12 New York, New York 10004

13 BY: CHRIS J. COULSON, ESQ.

14 (212) 425-7200

15 E-mail: ccoulson@kenyon.com

16 lquan@kenyon.com

17

18

19

20

21

22

23

24

Michalson, PhD., William R.
August 5, 2016

I N D E X

1		
2		
3	WITNESS:	WILLIAM R. MICHALSON, PhD.
4		
5	EXAMINATION BY:	PAGE:
6	Mr. Coulson	4
7		
8	EXHIBITS:	PAGE:
9	Exhibit 1004, Ligtenberg.....	81
10	Exhibit 1005, U.S. Patent, Rutledge.....	73
11	Exhibit 1006, U.S. Patent, Cooper.....	36
12	Exhibit 1007, U.S. Patent, Migdal.....	54
13	Exhibit 1008, Hoppe Article, Appendix N.....	42
14	Exhibit 1015, Declaration of William Michalson	
15	In Support of Petitioner's Reply to Patent	
16	Owner's Response.....	5
17	Exhibit 1015, Appendix EE, DeJong.....	98
18	Exhibit 2002, Page Proofs.....	9
19	Exhibit 2003, Bajaj, Topology Preserving Data	
20	Simplification with Error Bounds (Preprint)....	12
21	Exhibit 2004, Exhibit B.....	15
22	Exhibit 2005, History of GIS Chapter.....	20
23	Exhibit 2006, Declaration of Dr. Michalson.....	32
24	Exhibit 2010, Burr Patent No. 6,169549B1.....	41

Michalson, PhD., William R.
August 5, 2016

Page 4

1 WILLIAM R. MICHALSON, PhD., Deponent, having
2 first been satisfactorily identified and duly
3 sworn, deposes and states as follows:
4
5

6 EXAMINATION BY MR. COULSON:
7

8 Q. Good morning, Dr. Michalson.

9 A. Good morning.

10 Q. My name is Chris Coulson of the firm
11 of Kenyon & Kenyon, as you know, representing the
12 patent owners in this -- in IPR 201501432. And
13 you're here to testify regarding -- in that IPR,
14 regarding the 794 patent -- with regards to the
15 794 patent, right?

16 A. Yes.

17 Q. And you've been deposed a number of
18 times, Dr. Michalson; is that right?

19 A. Yes.

20 Q. Okay. So I'll just go through this
21 briefly. Is there any reason you can't testify
22 truthfully and accurately?

23 A. No.

24 Q. And would you let me know if you

1 have any -- don't understand any of the questions
2 I ask?

3 A. Sure.

4 Q. Thank you. Do you know Dr. Bajaj?
5 That's B-A-J-A-J.

6 A. No.

7 Q. Are you familiar with the computer
8 science program at the University of Texas Austin?

9 A. Not specifically. I'm aware that
10 they have a computer science program, yes.

11 Q. At this point, I'm going to hand you
12 a copy of what's been previously marked as
13 Exhibit 1050, which is your declaration in
14 response.

15 MR. DAY: Just to clarify, I think
16 he said 1050. I think this is 1015 in the
17 IPR. Are we using the same exhibit
18 numberings as the exhibits that have
19 already been submitted?

20 MR. COULSON: Thanks, I misspoke.
21 Exhibit 1015. We'll try to stick with the
22 previously-admitted exhibit numbers. By
23 the way, I'd like to -- Counsel, there
24 will -- I'd like to serve the exhibit list

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.