

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

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CASE IPR2016-00448  
Patent 7,908,343

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**DECLARATION OF OLENA IEREGA  
IN SUPPORT OF PATENT OWNER'S RESPONSE TO THE PETITION  
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,908,343**

Exhibit 2060

DECLARATION OF OLENA IEREGA

I, Olena Ierega, make the following declaration under penalty of perjury:

1. My name is Olena Ierega. I am an attorney at Andrews Kurth Kenyon LLP.

2. I have personal knowledge regarding the preparation of the exhibits described below.

3. Exhibit 2012 is a true and correct copy of a three-page document produced by Petitioner in the litigation between Petitioner and Patent Owner, *Bradium Technologies LLC v. Microsoft Corporation*, Case No. 15-cv-031 (D. Del.) (Feb. 3, 2016), with the Bates Numbers MSFT-BRAD-0044914 – 0044916.

I have personally downloaded this document from the production site of the abovementioned litigation on or about October 28, 2016.

4. Exhibit 2013 is a true and correct copy of an eleven-page document produced by Petitioner in the litigation between Petitioner and Patent Owner, *Bradium Technologies LLC v. Microsoft Corporation*, Case No. 15-cv-031 (D. Del.) (Feb. 3, 2016), with the Bates Numbers MSFT-BRAD-0044917 – 0044927.

I have personally downloaded this document from the production site of the abovementioned litigation on or about October 28, 2016. Document, identified as Exhibit 2013, on its face is dated, September, 2005.

DECLARATION OF OLENA IEREGA

5. Exhibit 2016 is a true and correct printed copy of an internet webpage entitled “The Global Innovation 1000: Top 29 R&D Spenders 2005-2015” that I downloaded from the URL <http://www.strategyand.pwc.com/global/home/what-we-hink/innovation1000/top-20-rd-spenders-2015> on or about October 26, 2016.

6. Exhibit 2017 is a true and correct printed copy of a screenshot I took of the internet webpage entitled “Microsoft's expenditure on research and development from 2002 to 2016 (in million U.S. dollars)” that is available at the URL <https://www.statista.com/statistics/267806/expenditure-on-research-and-development-by-the-microsoft-corporation/>. I took the screen shot of this webpage on or about October 31, 2016.

7. Exhibit 2018 is a true and correct printed copy of an internet webpage entitled “Convergence in North American Automotive Industry” that I downloaded from the URL [http://www.frost.com/srch/catalog-search.do?search\\_paths%5B%5D=&sortBy=R&searchType=sub&queryText=3DVU&rd\\_submit=Go](http://www.frost.com/srch/catalog-search.do?search_paths%5B%5D=&sortBy=R&searchType=sub&queryText=3DVU&rd_submit=Go), on or about October 31, 2016. The webpage, identified as Exhibit 2018, is dated, December 15, 2008.

8. Exhibit 2021 is a true and correct printed copy of an internet webpage entitled “3DVU Launches Navi2Go for BlackBerry, the First 3D Picture Navigation, in Anticipation of the Bold” that I downloaded from the URL <http://www.directionsmag.com/pressreleases/3dvu-launches-navi2go-for->

DECLARATION OF OLENA IEREGA

blackberry-the-first-3d-picture-navigation-in-ant/115362, on or about November 1, 2016. The webpage, identified as Exhibit 2021, is dated, July 11, 2008.

9. Exhibit 2030 is a true and correct printed copy of an internet webpage entitled “FlyOver Visual MAP™ Technology the first 3D aerial imagery Map to enriched Kenwood’s new HDD car navigation system” that I downloaded from the URL [http://www.silicomventures.com/newsletter\\_10\\_29\\_02/FlyOver.htm](http://www.silicomventures.com/newsletter_10_29_02/FlyOver.htm), on or about November 1, 2016. The webpage, identified as Exhibit 2030, is dated, October 6, 2002.

10. Exhibit 2031 is a true and correct printed copy of a screenshot that I have taken of the internet webpage entitled “3DVU Image Navigation fuels Kenwood Systems in Japan” that I downloaded from the URL <https://www.youtube.com/watch?v=3btUNuCYM6M>, on or about November 7, 2016.

11. Exhibit 2032 is a true and correct printed copy of an internet webpage entitled “FlyOver 2nd generation Visual MAPÂTechnology fuel Kenwood new Theater Navi – with 3D aerial imagery map” that I located at the URL <http://www.prweb.com/releases/2004/02/prweb103763.htm>, on or about October 31, 2016.

12. Exhibit 2038 is a true and correct printed copy of an article entitled “Daewoo introduces 3DVU’s Visual Map Navigation Technology” from June

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2006 GIS Development: Asia Pacific: The Monthly Magazine on Geographic Information Science, Vol. 10, Issue 6, page 9. I downloaded this article from the URL [https://www.geospatialworld.net/wp-content/uploads/magazine/925d04\\_apJune2006.pdf](https://www.geospatialworld.net/wp-content/uploads/magazine/925d04_apJune2006.pdf), on or about October 31, 2016.

13. Exhibit 2039 is a true and correct printed copy of an internet webpage entitled “Daewoo to Showcase 3DVU’s Visual Map Navigation Technology at the Busan International Motor Show, Korea” that I downloaded from the URL <http://www.theautochannel.com/news/2006/04/30/005219.html>, on or about November 1, 2016.

14. Exhibit 2042 is a true and correct printed copy of a screenshot that I caused to be taken of the internet webpage entitled “Navi2Go in Action” that is located at the URL <https://www.youtube.com/watch?v=rTGnseIwJbM>. The screenshot was taken on or about November 7, 2016.

15. Exhibit 2044 is a true and correct printed copy of an internet webpage entitled “Navi2Go – 3D Image Navigation System on Mobile Phone” that I downloaded from the URL [http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0ahUKEwjXiODdn\\_zPAhVG9YMKHamADQYQFggjMAE&url=http%3A%2F%2Ftechnode.com%2F2008%2F12%2F03%2Fnavi2go-%25E2%2580%2593-3d-](http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0ahUKEwjXiODdn_zPAhVG9YMKHamADQYQFggjMAE&url=http%3A%2F%2Ftechnode.com%2F2008%2F12%2F03%2Fnavi2go-%25E2%2580%2593-3d-)

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