

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

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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
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

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