

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 IPR2016-00449

Patent No. 8,924,506

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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 IPR2016-00449 for U.S. Patent No. 8,924,506 (the “’506 patent”).

2. In IPR2016-00449, I understand that Petitioner, Microsoft Corporation (“Microsoft” or “Petitioner”) is challenging the validity of Claims 1 through 21 of the ’506 Patent.

3. I understand that the Board instituted an *inter partes* review on the following Ground: Claims 1–21 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 ’506 Patent (Ex. 1002), which are Claims 1 through 21, would have been obvious to a person of ordinary skill in the art (“POSA”) as of the date of the invention.

5. Based on my analysis of the ’506 Patent and my understanding of the state of the relevant prior art as well as the specific references relied upon by the Petitioner for the ground that was instituted by the Board, it is my opinion that the challenged claims would not have been obvious to a POSA as of the date of the invention.

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