

February 13, 2017

By Email to EDay@perkinscoie.com and Counsel of Record in IPR2016-00448

Evan S. Day, Esq.
Perkins Coie LLP
11988 El Camino Real, Suite 350
San Diego, CA 92130-2594

Re: Microsoft Corp. v. Bradium Technologies LLC, Inter Partes Review Proceeding IPR2016-00448 (United States Patent 7,908,343) and IPR2016-00449 (United States Patent 8,924,506) Exhibit 1017

Counsel:

I write on behalf of Bradium Technologies LLC and Mr. Isaac Levanon regarding Exhibit 1017,¹ “Declaration of Yonatan Lavi,” which Petitioner Microsoft publicly filed in *Inter Partes* Review Proceeding IPR2016-00448 (United States Patent 7,908,343) and, following my February 9, 2016 letter, again filed publicly in IPR2016-00449 (United States Patent 8,924,506).

I renew my request that Microsoft file this exhibit under seal. In addition to confidential information that Mr. Lavi obtained via his employment with 3DVU entities, Exhibit 1017 also contains DENSO confidential information at Paragraphs 20 and 22. Microsoft has in its possession a copy of the DENSO license agreement, which is Exhibit 2029, which was filed under seal and served on Microsoft in the IPR proceedings in November 2016.

Also, I have not received a response to the following questions raised in my February 9 letter:

- Does Perkins Coie LLP represent Mr. Lavi?
- Will Petitioner Microsoft make Mr. Lavi available for deposition in the United States at our New York office at One Broadway, New York, New York, 10004 on March 2, 2017, and will Mr. Lavi remain available on March 3 if needed?

Also, please confirm, as requested in my February 9 letter, that Perkins Coie LLP and Microsoft will retain and not destroy any and all communications, including drafts, exchanged with Mr. Lavi. Please also advise whether you have communicated with Mr. Lavi the request to retain all documents.

¹ As you responded to my February 9, 2017 letter directed to Mr. Ng., I direct this letter to you for your convenience.

February 13, 2017
Page 2

I would appreciate your response to the above at your earliest convenience.

Very truly yours,

/s/ Chris J. Coulson

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