

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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UNIFIED PATENTS INC.,

Petitioner,

v.

BRADIUM TECHNOLOGIES LLC,

Patent Owner.

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Case IPR2018-00952

Patent No. 9,253,239

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**DECLARATION OF LIBERTY QUAN IN SUPPORT OF  
PATENT OWNER'S PRELIMINARY RESPONSE  
UNDER 37 C.F.R. § 42.107**

I, Liberty Quan, make the following Declaration pursuant to 28 U.S.C. §1746:

1. I am a paralegal at the law firm of Bunsow De Mory LLP.
2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding.
3. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.
4. On September 14, 2018, I accessed Unified Patents Portal (“the Portal”), which is accessible at <https://portal.unifiedpatents.com/>.
5. I ran a search for P.T.A.B. petitions filed by Petitioner: Unified Patents Inc. and Case Type: IPR. I found that there were 114 IPR Petitioners filed by Unified from September 16, 2013 to June 22, 2018.
6. I then ran a litigation search in the Portal for District Court and International Trade Commission cases and listed all 114 patents Unified Patents filed IPR petitions against.
7. Upon further review, I found that at least 64 IPR petitions were filed by Unified Patents where its [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Therefore, I could not ascertain whether there are additional patent litigation cases on the 114 patents

noted above that were filed against [REDACTED]

8. I found that 14 IPRs were filed by Unified Patents on patents Google had previously been sued on.

9. I found that 23 IPRs were filed by Unified Patents on patents [REDACTED] had been sued on.

10. Exhibit 2036 is true and correct copy of my “Summary of Findings: Search Results Using Unified Patents Portal.” The information in Exhibit A is a summary of my findings as indicated in this Declaration.

I hereby declare that all the statements made in this Declaration are of my own knowledge and true; that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of the Title 18 of the United States Code. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of September, 2018, at Redwood City, California.

  
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Liberty Quan