

PUBLIC REDACTED VERSION

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,
Petitioner,

v.

BRADIUM TECHNOLOGIES LLC,
Patent Owner.

Case IPR2018-00952
Patent No. 9,253,239

**BRADIUM TECHNOLOGIES LLC'S
SUR-REPLY TO PETITIONER'S PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. §42.108(c)**

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TABLE OF AUTHORITIES**Page****Cases**

<i>Applications in Internet Time, LLC v. RPX Corp.</i> , 897 F.3d 1336 (Fed. Cir. 2018).....	2, 3, 4, 5
<i>California Physicians' Serv. v. Aoki Diabetes Research Inst.</i> , 163 Cal. App. 4th 1506 (2008)	2
<i>Unified Patent v. Plectrum LLC</i> , IPR 2017-01430 (Nov. 13, 2018)	4
<i>Unified Patents Inc. v. Realtime Adaptive Streaming, LLC</i> , IPR2018-00883 (Oct. 11, 2018).....	4, 5

EXHIBIT LIST

Exhibit	Description
2001	USPTO Public PAIR screen capture for Correspondence Address and Attorney/Agent Information for Application No. 14/547,148 ('293 Patent)
2002	Notice of Acceptance of Power of Attorney, Date Mailed 03/11/2016, for Application No. 14/547,148 ('293 Patent)
2003	Declaration of Michael N. Zachary in Support of Patent Owner's Motion for <i>Pro Hac Vice</i>
2004	PROTECTIVE ORDER MATERIAL: Transcript of Deposition of Unified Patents CEO, Kevin Jakel dated September 10, 2018
2005	<i>Team</i> , Unified Patents, https://www.unifiedpatents.com/team/#
2006	<i>Join</i> , Unified Patents, https://www.unifiedpatents.com/join/
2007	<i>Join</i> , Unified Patents (May 17, 2018), https://web.archive.org/web/20180517015601/https://www.unifiedpatents.com/join/
2008	PROTECTIVE ORDER MATERIAL: Unified Patents Membership Agreement
2009	PROTECTIVE ORDER MATERIAL: Exhibit A: Subscription Form – Internet of Things (IoT) Zone
2010	Belcher, Marta, et al., "Hacking the Patent System: A guide to Alternative Patent Licensing for Innovators," <i>Juelsgaard Intellectual Property & Innovation Clinic Stanford Law School</i> , dated May 2014
2011	<i>Protected Zones</i> , Excerpt of United Patents (Oct. 27, 2016), https://web.archive.org/web/20161027135832/http://www.unifiedpatents.com:80/zones/
2012	U.S. Patent No. 9,253,239, "Optimized Image Delivery Over Limited Bandwidth Communication Channels," issued Feb. 2, 2016 ("239 Patent") (Not filed)
2013	PROTECTIVE ORDER MATERIAL: Petitioner's Voluntary Interrogatory Response

Exhibit	Description
2014	<i>Bradium Technologies LLC</i> , Unified Patents (August 3, 2015), https://web.archive.org/web/20150803044103/http://bradiumtechnologies.com/
2015	Docket Navigator of Unified Patents dated Jun. 17, 2015
2016	<i>Bradium Technologies LLC v. Microsoft Corp.</i> , Complaint, filed Jan. 9, 2015
2017	<i>Bradium Technologies and Microsoft Settle Patent Lawsuit</i> , Bradium Technologies (Oct. 17, 2017), http://www.bradiumtechnologies.com/bradium/bradium-technologies-and-microsoft-settle-patent-lawsuit
2018	<i>Unified Patents, backed by Google, takes fight to patent trolls</i> , Don Reisinger, CNET (Apr. 8, 2013)
2019	Don Clark, New Venture Enters Patent Fray, <i>Wall Street Journal</i> , published Apr. 7, 2013
2020	<i>The Gloves are Off: Unified Patents Inc. Unveils Its 'NPE Deterrent' Strategy</i> , Unified Patents (September 23, 2013), http://justdemo.in/unified/2013/09/23/the-gloves-are-off-unified-patents-inc-unveils-its-npe-deterrent-strategy/
2021	<i>Unified Patents Challenges Clouding IP Patent Seeks to Push Patent Trolls Out of Cloud Storage</i> , Unified Patents (September 23, 2013), http://unifiedpatents.com/2013/09/23/unified-patents-challenges-clouding-ip-patent-seeks-to-push-patent-trolls-out-of-cloud-storage/
2022	<i>Unified has challenged almost all of 2017's most prolific NPEs</i> , United Patents (Jul. 5, 2017), https://www.unifiedpatents.com/news/2017/7/5/according-to-rpx-datea-has-challenged-almost-all-of-2017s-most-prolific-npes
2023	Email from Unified Patents to Michael Zachary re "Unified reaches 100 challenges," dated Nov. 15, 2017
2024	Unified Patents (January 1, 2014), https://web.archive.org/web/20140101033720/http://unifiedpatents.com/

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