

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 DR. PEGGY AGOURIS  
IN SUPPORT OF  
BRADIUM TECHNOLOGIES LLC'S  
PATENT OWNER CONTINGENT MOTION TO AMEND PURSUANT TO  
37 C.F.R. §42.121**

**Bradium Exhibit 2055**

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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 IPR2018-00952 for U.S. Patent No. 9,253,239 (“the ’239 Patent”). I previously provided a declaration for IPR2016-01897, which also involved claims of U.S. Patent No. 9,253,239, which is Exhibit 2014 for that proceeding.

2. In this proceeding (IPR No. IPR2018-00952), I understand that Unified Patents Inc. (“Unified” or “Petitioner”) filed a petition challenging the validity of Claims 1 through 25 of the ’239 Patent. I further understand that Bradium disclaimed all claimed except for Claim 20 (which depends from Claim 1).

3. I further understand that Bradium is seeking to amend claim 20 in the alternative, and, should original claim 20 be invalidated, amended claim 20 and new claim 21 may be considered by the Board.

4. I understand that, for this proceeding, IPR2018-00952, the Board has instituted a review as to claim 20.

5. I understand that the Board has instituted an inter partes review on a on a single ground: whether Claim 20, which depends from Claim 1, is unpatentable as obvious over the combination of Reddy, Hornbacker, and Rosasco.

I was asked to consider whether amended Claim 20 and new claim 21, are supported by the written description and where those claims would have been patentable as of the date of the invention.

6. For time spent in connection with this case, I am being compensated at my customary rate. My compensation is not dependent upon the outcome of this petition or any issues involved in or related to the '239 Patent, and I have no other financial stake in this matter. I have no financial interest in, or affiliation with, any of the real parties in interest or the patent owner.

## **II. BACKGROUND AND QUALIFICATIONS**

7. This is a summary of my background and qualifications. I set forth my background in more detail in my Curriculum Vitae which is attached as Appendix A.

8. I am currently Dean of the College of Science at George Mason University. I am additionally the Director of the Center for Earth Observing & Space Research at George Mason University. I was previously employed as a Professor of Geoinformatics at the College of Science at George Mason University.

9. Prior to my employment at George Mason University, I was an assistant professor, and then associate professor, at the School of Computing and Information Science at the University of Maine from 1995 to 2001 and 2001 to

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