

**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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IPR2018-00952  
Patent 9,253,239

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

**Bromium Exhibit 2026**

I, Chris J. Coulson, make the following declaration pursuant to 28 U.S.C. §1746:

1. I am an attorney at the law firm of Bunsow De Mory LLP.
2. I provide this declaration in connection with Patent Owner's

Preliminary Response under 37 C.F.R. § 42.107 to the request for *Inter Partes* Review No. IPR2018-00952.

3. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

4. Exhibit 2005 hereto is a true and correct copy of a web page entitled "Team," downloaded from the Unified Patents website via the URL on the bottom of each page of Exhibit 2005: <https://www.unifiedpatents.com/team/#>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

5. Exhibit 2006 hereto is a true and correct copy of a web page entitled "Join," downloaded from the Unified Patents website via the URL on the bottom of each page of Exhibit 2006: <https://www.unifiedpatents.com/join/>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

6. Exhibit 2007 hereto is a true and correct copy of a web page entitled "Join," dated May 17, 2018, downloaded from the [web.archive.org](http://web.archive.org) website via the

URL on the bottom of each page of Exhibit 2007:

[https://web.archive.org/web/20180517015601/https://www.unifiedpatents.com/join](https://web.archive.org/web/20180517015601/https://www.unifiedpatents.com/join-1/)

/. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

7. Exhibit 2010 hereto is a true and correct copy of Belcher, Marta, et al., “Hacking the Patent System: A guide to Alternative Patent Licensing for Innovators,” Juelsgaard Intellectual Property & Innovation Clinic Stanford Law School, dated May 2014, downloaded from the Unified Patents website via: <https://www.unifiedpatents.com/join-1/>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

8. Exhibit 2011 hereto is a true and correct copy of a web page entitled “Protected Zones,” downloaded from web.archive.org website via the URL on the bottom of each page of Exhibit 2011: <https://web.archive.org/web/20161027135832/http://www.unifiedpatents.com:80/zones/>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

9. Exhibit 2017 hereto is a true and correct copy of a web page entitled “Bromium Technologies and Microsoft Settle Patent Lawsuit,” dated October 17, 2017, downloaded from the Bradium Technologies website via the URL on the

bottom of each page of Exhibit 2017:

<http://www.bradiumtechnologies.com/bradium/bradium-technologies-and-microsoft-settle-patent-lawsuit>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

10. Exhibit 2024 hereto is a true and correct copy of Excerpts of Unified Patents Home Page dated January 4, 2014, downloaded from the Unified Patents website via the URL on the top of each page of Exhibit 2024:

<https://web.archive.org/web/20140101033720/http://unifiedpatents.com/>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

11. Exhibit 2028 hereto is a true and correct copy of a web page entitled “Orthogonality,” downloaded from the Wikipedia website via the URL on the bottom of each page of Exhibit 2028: <https://en.wikipedia.org/wiki/Orthogonality>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

12. Exhibit 2029 hereto is a true and correct copy of a web page entitled “IPRs: Balancing Effectiveness vs. Cost,” printed from the RPX Corp. website via the URL listed on the bottom of each page of Exhibit 2029:

<https://www.rpxcorp.com/2016/06/17/iprs-balancing-effectiveness-vs-cost/>. An exhibit label and page numbers have been added to the bottom of the document,

but no other alterations have been made.

13. Exhibit 2030 hereto is a true and correct copy of a web article entitled “How much does IPR cost?,” printed from the Patent Trademark Blog: IPR Q&A website via the URL on the bottom of each page of Exhibit 2030:

<http://www.patenttrademarkblog.com/how-much-does-ipr-cost/>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

14. Exhibit 2033 hereto is a true and correct copy of a web page entitled “NPE Zones: Deter bad NPE conduct,” printed from Unified Patents’ website via the URL listed on the bottom of each page of Exhibit 2033:

<https://www.unifiedpatents.com/npe/>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

15. Exhibit 2038 hereto is a true and correct copy of a web page entitled “Unified’s Real Party-in-Interest PTAB Panel Decisions (/news/real-party-in-interest-panel-decisions),” printed from Unified Patents’ website via the URL listed on the bottom of each page of page 5 Exhibit 2038:

<https://www.unifiedpatents.com/news/real-party-in-interest-panel-decisions>. An exhibit label and page numbers have been added to the bottom of the document, but no other alterations have been made.

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