# UNITED STATES PATENT AND TRADEMARK OFFICE

# BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,

Petitioner,

v.

## BRADIUM TECHNOLOGIES LLC,

Patent Owner.

Case IPR2016-00449 Patent 8,924,506 B2

Paper 31

# PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

February 10, 2017

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# UPDATED EXHIBIT LIST

Ex. 1001 U.S. Patent No. 7,908,343 B2 to Levanon et al. ("the 343 Patent") Ex. 1002 U.S. Patent No. 8,924, 506 B2 to Levanon et al. ("the 506 Patent") Ex. 1003 PCT Publication No. WO 99/41675 to Cecil V. Hornbacker, III ("Hornbacker") Ex. 1004 Reddy et al., "TerraVision II: Visualizing Massive Terrain Databases in VRML," IEEE Computer Graphics and Applications March/April 1999, pp. 30-38 ("Reddy" with added paragraph numbers by Petitioner for ease of reference in the Petition) Ex. 1005 Declaration of Prof. William R. Michalson ("Michalson Decl.") with Appendices Ex. 1006 EP1070290 to Cecil V. Hornbacker, III Ex. 1007 Printout of IEEE Explore citations to Reddy et al. (Ex. 1004) Printout of Google Scholar citations to Reddy et al. (Ex. 1004) Ex. 1008 Ex. 1009 Cover page and authenticating declaration of Reddy et al. (Ex. 1004) from British Library Cover page of Reddy et al. (Ex. 1004) from Linda Hall Library Ex. 1010 Ex. 1011 Proof of Service dated Jan. 12, 2015 in Case No. 15-cv-00031-RGA, Bradium Technologies, LLC v. Microsoft Corp. Ex. 1012 Affidavit of Matthew C. Bernstein in Support of Petitioner's Motion for Pro Hac Vice Admission Ex. 1013 Affidavit of Evan S. Day in Support of Petitioner's Motion for Pro Hac Vice Admission Ex. 1014 LinkedIn Page for Isaac Levanon

- Ex. 1015 IEEE 802.11a1999, Wikipedia, available at https://en.wikipedia.org/w/index.php?title=IEEE\_802.11a-1999&oldid=740398108
- Ex. 1016 Declaration of Prof. William R. Michalson in Support of Petitioner's Reply to Patent Owner's Response
- Ex. 1017 Declaration of Yonatan Lavi, with Exhibits A-F
- Ex. 1018 Deposition Transcript of Peggy Agouris, dated January 13, 2017
- Ex. 1019 Deposition Transcript of Isaac Levanon, dated January 18, 2017
- Ex. 1020 Fujitsu Technical Reference Guide, Stylistic 2300, Copyright 1998
- Ex. 1021 Not Used in This Proceeding
- Ex. 1022 The Universal Grid System, NGA Office of GEOINT Sciences, March 2007
- Ex. 1023 Wolford, B., FXT1: 3dfx Texture Compression, Last Updated September 14, 1999, available at http://web.archive.org/web/ 20000114134331/http://www.combatsim.com/htm/sept99/3dfxtc1.htm
- Ex. 1024 U.S. Patent Publication No. 2008/0294332 A1 to Levanon et al.
- Ex. 1025 U.S. Patent No. 7,561,156 B2 to Levanon et al.
- Ex. 1026 Excerpt of Initial Claim Chart, *Bradium Techs. LLC v. Microsoft Corporation*, No. 15-cv-31-RGA (D. Del)
- Ex. 1027 Bing Maps Preview App for Windows in the Window Store, available at http://web.archive.org/web/20140101045325/http:/apps.microsoft. com/windows/en-us/app/bing-maps-preview/75ce2a6a-8a25-4916-83d0-19b8e7b60787
- Ex. 1028 Windows 8 and 8.1 System Requirements, available at https://support.microsoft.com/en-us/help/12660/windows-8-systemrequirements

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