#### UNITED STATES PATENT AND TRADEMARK OFFICE

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

GENERAL ELECTRIC CO. Petitioner,

v.

## GROUPCHATTER, LLC, Patent Owner

Patent Nos. 7,969,959, 8,199,740, 8,588,207, and 9,014,659 Issued: Jun. 28, 2011, June. 12, 2012, Nov. 19, 2013, and Apr. 21, 2015 Filed: Dec. 16, 2005, Jun. 6, 2011, May 21, 2012, Nov. 8, 2013 Inventors: James M. Dabbs, III et al.

Titled: Method and apparatus for efficient and deterministic group alerting

## **Declaration of Bruce Deer Regarding**

U.S. Patent Nos. 7,969,959, 8,199,740, 8,588,207, and 9,014,659



I, Bruce Deer, do hereby declare and state, that all statements made herein of my own knowledge are true and 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 Title 18 of the United States Code.

Dated: November 22 2016

Bruce Deer

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		"mobile device" means "a wireless device that can be in motion during normal use a pager, cell phone, or wireless personal data assistants (PDA), or portable computing WiFi" in this review	uter
	(ii) proc	"responder device" means a "mobile device capable of responding" in this reeding.	. 27
	(iii)	"recipient" means "a user who receives a message via a mobile device" in this revi 28	ew
	(iv)	"alerting" means "notifying" in this review	. 29
	(v) mes	"type of message" refers to whether a message is a group message, an individual sage sent to one pager, or an individual message received from one pager	. 30
	(vi)	"network client" means a "device that can initiate a broadcast group message"	. 31
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