

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FACEBOOK, INC., INSTAGRAM, LLC, and WHATSAPP INC.,
Petitioners,

v.

BLACKBERRY LIMITED,
Patent Owner

IPR2019-00528
U.S. Patent No. 8,279,173

**DECLARATION OF DR. RAJEEV SURATI
IN SUPPORT OF PATENT OWNER'S RESPONSE**

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I, Rajeev Surati, declare as follows:

I. INTRODUCTION

1. My name is Rajeev Surati. I am President at Computation and Imaging, a consultancy providing strategic and implementation services for intellectual property and business issues both related to computation and imaging with cameras and display devices and storage of such imagery. I am also an Engineer at Hydrow.com working on AR/VR and machine vision. I have been retained to serve as an expert on behalf of Patent Owner BlackBerry Limited (“BlackBerry” or “Patent Owner”) in connection with the above-captioned *inter partes* review (“IPR”) proceeding, to provide my analyses and opinions in certain technical aspects of this proceeding. I understand that this Declaration is used to support BlackBerry’s Patent Owner Response regarding challenged claims of U.S. Patent No. 8,279,173 (“the ’173 Patent”) (Ex. 1001).

2. I am being compensated for my work on this case at my standard consulting rate of \$540 per hour. I am also being reimbursed for all incurred expenses. No part of my compensation is contingent upon the outcome of this proceeding. I have no other interests in this proceeding or with any of the parties.

3. I am competent to testify to the matters stated in this Declaration, have personal knowledge of the facts and statements herein, and each of the statements is true and correct.

II. BASIS FOR OPINION

A. Qualifications

4. I have more than 25 years of experience in the fields of electrical engineering and computer science. Additionally, I have at least 19 years of experience in owning and running software companies that utilize database-backed systems, including Internet photo databases, as well as extensive experience in designing and building user interfaces.

5. I received a bachelor's degree (1992), master's degree (1995), and a Ph.D. (1999) in Electrical Engineering and Computer Science from Massachusetts Institute of Technology ("MIT").

6. I am an inventor of U.S. Patent No. 5,943,478, entitled "System for Immediate Popup Messaging Across the Internet," which describes a system and user interface for sending and displaying instant messages in popup windows between Internet users.

7. In 1996, I founded Flash Communications, a company focused on technology related to U.S. Patent No. 5,943,478 and associated technology that I had developed related to pop-up instant messaging over the Internet. Microsoft Corporation purchased Flash Communications in 1998 and incorporated its messaging technology into Microsoft's Messenger service and Exchange 2000 Server Instant Messaging Service.

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