

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

BLACKBERRY LIMITED,  
*Patent Owner*

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

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**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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