

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

SNAP INC.,  
Petitioner

v.

BLACKBERRY LIMITED  
Patent Owner

---

Patent No. 8,825,084

---

**DECLARATION OF DR. SAMRAT BHATTACHARJEE**

**TABLE OF CONTENTS**

TABLE OF CONTENTS.....i

I. INTRODUCTION .....1

II. QUALIFICATIONS .....1

III. SUMMARY OF OPINIONS.....5

IV. LEVEL OF ORDINARY SKILL IN THE ART .....6

V. BACKGROUND OF THE RELEVANT FIELD .....7

VI. OVERVIEW OF THE '084 PATENT .....8

VII. CLAIM CONSTRUCTION .....10

    A. “determine at least one action spot within a predetermined distance from the current location of the first mobile device.” .....10

VIII. OVERVIEW OF THE PRIOR ART .....12

    A. *Winkler* .....12

    B. *Altman*.....15

    C. *Lemmela* .....17

    D. *Crowley* .....19

IX. THE PRIOR ART TEACHES OR SUGGESTS ALL THE FEATURES OF CLAIMS 1-2, 5-6, 9-10, 12-13, and 15 OF THE '084 PATENT .....20

    A. Ground 1: *Winkler* and *Altman* Teach or Suggest the Features of Claims 1-2, 5-6, 9-10, 12-13, and 15 of the '084 Patent .....20

        1. Claim 1 .....20

        2. Claim 2 .....43

        3. Claim 5 .....44

        4. Claim 6 .....44

        5. Claim 9 .....46

        6. Claim 10 .....53

        7. Claim 12 .....54

8.	Claim 13 .....	56
9.	Claim 15 .....	57
B.	Ground 2: <i>Lemmela</i> and <i>Crowley</i> Teach or Suggest the Features of Claims 1-2 and 5-6 of the '084 Patent .....	58
1.	Claim 1 .....	58
2.	Claim 2 .....	70
3.	Claim 5 .....	71
4.	Claim 6 .....	72
C.	Ground 3: <i>Lemmela</i> and <i>Crowley</i> and <i>Winkler</i> Teach or Suggest the Features of Claims 9-10, 12-13, and 15 of the '084 Patent .....	73
1.	Claim 9 .....	74
2.	Claim 10 .....	79
3.	Claim 12 .....	80
4.	Claim 13 .....	81
5.	Claim 15 .....	82
X.	CONCLUSION.....	84

I, Dr. Samrat Bhattacharjee, declare as follows:

**I. INTRODUCTION**

1. I have been retained by Snap Inc. (“Petitioner”) as an independent expert consultant in this proceeding before the United States Patent and Trademark Office (“PTO”) regarding U.S. Patent No. 8,825,084 (“the ’084 patent”) (Ex. 1001). I have been asked to consider, among other things, whether certain references teach or suggest the features recited in claims 1-2, 5-6, 9-10, 12-13, and 15 (“the challenged claims”) of the ’084 patent. My opinions are set forth below.

2. I am being compensated at my normal rate of \$600 per hour for the time I spend on this matter. No part of my compensation is dependent on the outcome of this proceeding or any other proceeding involving the ’084 patent. I have no other interest in this proceeding.

**II. QUALIFICATIONS**

3. My qualifications for forming the opinions in this report are summarized here and explained in more detail in my curriculum vitae, which I understand is provided as Exhibit 1003.

4. I earned a Ph.D. in Computer Science from Georgia Institute of Technology in 1999. Before that, I earned Bachelor of Science degrees in Mathematics and Computer Science from Georgia College and State University in

1994. I was a Teaching Assistant at the Georgia Institute of Technology from 1994 to 1995 and an Instructor in 1998.

5. From 1999 through 2005, I was an Assistant Professor at the University of Maryland, College Park, in the Department of Computer Science, and then an Associate Professor with tenure from 2005 through 2009. In 2006, I was a Visiting Professor at Max Planck Institut für Software Systems in Saarbrücken, Germany. In 2007, I was a Visiting Researcher at AT&T Labs in Florham Park, New Jersey.

6. Since 2009, I have been a tenured Professor at the University of Maryland. My teaching and research have focused on systems, security, and computer networking, including mobile systems and all aspects of the technologies pertaining to the '084 patent.

7. I have served as a reviewed for ACM/IEEE Transactions on Networking, IEEE Journal on Selected Areas in Communications, Computer Communications Journal (Special Issue on Network Security), ACM Transactions on Computer Systems, Performance Evaluation Journal, Computer Communications Review, European Transactions on Telecommunications, IEEE Transactions on Parallel and Distributed Systems, and ACM Transactions on Internet Technology.

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.