

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SNAP INC.,
Petitioner

v.

BLACKBERRY LIMITED
Patent Owner

Case No. IPR2019-00715
Patent No. 8,326,327

REBUTTAL DECLARATION OF DR. SAMRAT BHATTACHARJEE

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 A. The *Lemmela-Crowley* combination discloses the “determin[e] / [ing] at least one action spot” recited in claims 1, 10, and 1316

 B. The *Lemmela-Crowley* combination discloses the “activity level” recited in claims 1 and 1326

 C. The *Lemmela-Crowley* combination discloses the activity level based upon a number of actions “within a predetermined distance from the at least one action spot” as recited in claims 3 and 1531

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Declaration of Dr. Samrat Bhattacharjee
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