

1 UNITED STATES PATENT AND TRADEMARK OFFICE

2
3 BEFORE THE PATENT TRIAL AND APPEAL BOARD
4

5
6 FACEBOOK, INC., INSTAGRAM, LLC, AND WHATSAPP INC.

7 Petitioner

8 v.

9 BLACKBERRY LIMITED

10 Patent Owner
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14 Case IPR2019-00925

15 Patent 8,209,634
16

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18 VIDEOCONFERENCE DEPOSITION OF SANDEEP CHATTERJEE, Ph.D.

19 Taken May 8, 2020

20 Commencing at 11:00 a.m. CDT
21

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23
24 REPORTED BY: KELLEY E. ZILLES, RPR

25 JOB NUMBER: 4092570

1 Videoconference deposition of SANDEEP CHATTERJEE,
2 Ph.D., taken on the 8th day of May 2020, commencing at
3 11:00 a.m. CDT, located in Foster City, California,
4 before Kelley E. Zilles (Via Videoconference),
5 Registered Professional Reporter and a Notary Public of
6 and for the State of Minnesota.

7 *****

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22 NOTE: The original transcript will be delivered to

23 Craig Deutsch, Esq., as the taking party of the

24 deposition.

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REFERRING TO PREVIOUSLY MARKED EXHIBITS:

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Deposition Exhibit 1109..... 24

EXHIBITS MARKED AND REFERRED TO:

(No exhibits were marked for identification.)

1 SANDEEP CHATTERJEE, PH.D.,
2 duly sworn, was examined and testified as follows:

3 EXAMINATION

4 BY MR. DEUTSCH:

5 Q. Thank you for joining today, Dr. Chatterjee. I
6 will of course be asking several questions. As usual,
7 if I ask a question and I'm unclear, please go ahead and
8 ask me to clarify and I will restate or rephrase the
9 question. If you don't ask me to clarify I'll assume
10 you understood the question, is that fair?

11 A. Yes.

12 Q. All right. Please refer to Exhibit 1110. This
13 is the Crumlish exhibit. Do you recall the Pegasus mail
14 program that is listed in Crumlish?

15 A. I do.

16 Q. In the Pegasus mail program, once you've read a
17 message it will automatically be moved to the main mail
18 folder after you close the new mail folder or exit
19 Pegasus, is that correct?

20 A. Something like that, yes. I haven't memorized
21 everything in Crumlish, but yes, I do vaguely remember
22 that it works something like that.

23 Q. And go ahead, this is Pages 63 and 64 of
24 Exhibit 1110 is a discussion of Pegasus mail. And in
25 particular on Page 64, the feature I mentioned is

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