

Declaration of Sandeep Chatterjee, Ph.D. in Support of
Petition for *Inter Partes* Review of
U.S. Patent No. 8,209,634 B2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SNAP INC.,
Petitioner

v.

BLACKBERRY LIMITED,
Patent Owner

U.S. Patent No. 8,209,634 B2
Issue Date: June 26, 2012

Title: PREVIEWING A NEW EVENT ON A SMALL SCREEN DEVICE

DECLARATION OF SANDEEP CHATTERJEE, PH.D.

Table of Contents

	Page
I. INTRODUCTION AND QUALIFICATIONS	1
A. Qualifications and Experience	1
B. Materials Considered.....	4
II. PERSON OF ORDINARY SKILL IN THE ART	6
III. STATEMENT OF LEGAL PRINCIPLES.....	8
A. Claim Construction.....	8
IV. THE '634 PATENT.....	10
A. Overview of the Specification.....	10
B. The Challenged Claims	13
C. Disputed Claim Terms.....	14
1. “Wireless Communication Device”.....	14
2. “Messaging Correspondent”	23
3. “numeric character representing a count of the plurality of different message correspondents for which one or more of the electronic messages have been received and remain unread”	24
V. APPLICATION OF THE PRIOR ART TO ASSERTED CLAIMS	24
A. Brief Summary of Prior Art.....	26
1. Prior Art for Ground 1	26
(a) Ording [Ex. 1103].....	26
(b) Abiko [Ex. 1109]	29
(c) Crumlish [Ex. 1110]	34
(d) Dvorak [Ex. 1111]	36
2. Prior Art for Ground 2	37
(a) McPherson [Ex. 1112].....	37
B. Ground 1: Obviousness of Claims 1, 4-5, 7, 10-11, 13 and 16- 17 Over Ording in view of Abiko, Crumlish, and Dvorak.....	40

Table of Contents

	Page
1. Claim 1	40
(a) “displaying at least one icon relating to electronic messaging on a graphical user interface of the wireless communication device” (Claim 1[a])	50
(b) “receiving a plurality of electronic messages on the wireless communication device, the plurality of electronic messages including messages from a plurality of different messaging correspondents” (Claim 1[b])	52
(c) “in response to receiving at least one of the plurality of electronic messages, visually modifying at least one displayed icon relating to electronic messaging to include a numeric character representing a count of the plurality of different messaging correspondents for which one or more of the electronic messages have been received and remain unread.” (Claim 1[c])	55
2. Claim 4	69
3. Claim 5	69
4. Claim 7	72
5. Claims 10-11	75
6. Claim 13	76
7. Claims 16-17	79
C. Ground 2: Obviousness of Claims 6, 12 and 18 Over Ordning in view of Abiko, Crumlish, and Dvorak, in further view of McPherson	80
D. Grounds 3-4: Further Combination with Strom if “Wireless Communication Device” Requires a Small Screen Display	86
VI. NO SECONDARY CONSIDERATIONS OF NON-OBVIOUSNESS	101
VII. CONCLUSION.....	104

Declaration of Sandeep Chatterjee, Ph.D. in Support of
Petition for *Inter Partes* Review of
U.S. Patent No. 8,209,634 B2

I, Sandeep Chatterjee, Ph.D., declare as follows:

I. INTRODUCTION AND QUALIFICATIONS

A. Qualifications and Experience

1. I am the Chief Executive Officer of Experantis LLC, a technology consulting company. I am also the Dean of the Mobility Center of Excellence at the International Institute of Digital Technologies. Previously, I was the Executive Vice President and Chief Technology Officer of SourceTrace Systems, Inc., a technology and services company enabling the delivery of secure remote electronic services over landline and wireless telecommunications networks.

2. I received my bachelor's degree in Electrical Engineering and Computer Science from the University of California, Berkeley in 1995. I received my master's degree in Computer Science from the Massachusetts Institute of Technology (MIT) in 1997, and my doctorate in Computer Science from MIT in 2001. I received a certificate of completion for an executive education program on global leadership from Harvard University in 2011. My doctoral dissertation at MIT, entitled "Composable System Resources for Networked Systems," which involved networked client architectures and systems, was selected as one of the top inventions in the history of MIT's Laboratory for Computer Science. This invention is showcased in a time capsule at the Museum of Science in Boston, Massachusetts.

3. In 2011, I was named a Young Global Leader. This honor, bestowed

Declaration of Sandeep Chatterjee, Ph.D. in Support
of Petition for *Inter Partes* Review of
U.S. Patent No. 8,209,634 B2

each year by the World Economic Forum, recognizes and acknowledges the top leaders—all below the age of 40—from around the world for their professional accomplishments, commitment to society, and potential to contribute to shaping the future of the world. In 2016, I was appointed to the World Economic Forum’s expert network as an expert in technology and innovation, and I advise world leaders on issues related to technology and innovation.

4. From 1997, I was the Entrepreneur-in-Residence at FidelityCAPITAL, the venture capital arm of Fidelity Investments. In 1999, I founded and served as President and Chief Technology Officer (CTO) of Satora Networks, which developed tools and technologies for building appliances and services for the Internet using wireless and other technologies to extend it beyond the desktop.

5. In 2001, I joined Bluestone Software’s Mobile Middleware Labs as a Senior Engineer developing applications and systems infrastructure for enterprise Java/J2EE, Web services, and enterprise mobile solutions. After the completion of Hewlett-Packard’s (“HP”) acquisition of Bluestone, I became a Senior Member of the Technical Staff at HP’s Middleware Division. I was responsible for architecting and developing the company’s next-generation Web services platform for enterprise as well as mobile environments, known as the Web Services Mediator.

6. I was part of the Expert Group that developed the JSR-00172 J2ME

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.