UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

In Re:	U.S. Patent No. 7,475,246	:	Attorney Docket No. 081841.0119
Inventor:	Moskowitz, Scott A.;	:	
	Berry, Mike W.	:	
Filed:	Aug. 4, 2000	:	
Issued:	Jan. 6, 2009	: IPR No.: Unassigned	
Assignee:	Wistaria Trading Ltd.		
Title:	Secure personal content server		

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Submitted Electronically via the Patent Trial and Appeal Board End to End System

DECLARATION OF SANDEEP CHATTERJEE, Ph.D.

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

1.   I make this declaration based upon my own personal knowledge and, if called upon to testify, would testify competently to the matters contained herein.

2.   I have been asked to provide technical assistance in the *inter partes* review of U.S. Patent No. 7,475,246 ("the '246 Patent").[1]

3.   This declaration is a statement of my opinions on issues related to the patentability of claims 1, 17, 20, 21, 24, 25, and 31 of the '246 Patent.

I.   Background and Qualifications

4.   My background and qualifications are stated more fully in my *Curriculum Vitae*.[2] As reflected in my *Curriculum Vitae* (and as explained below), I have significant professional experience related to the technology described in the '246 Patent, including architecting, developing, optimizing, deploying and managing complex computing systems (including hardware and software for these systems) for the secure distribution of digitized information, such as mobile and wireless computing systems, distributed computing systems and software-as-a-service (SaaS) systems using different technologies and platforms. Many of these systems included specific security

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[1] Ex[1003].

[2] Ex[1007].

and policy requirements for different content and data sets. For example, one of the systems I architected and developed securely distributed and managed still image and audio content to different wireless and wireline devices. Policies associated with the content determined which users and devices could access and view the image and audio content. Another one of the systems I architected and developed limited access to certain audio and image content to certain users. User access was based upon specific triggers, e.g., time-of-day, content type, user restrictions, etc. I provide a brief summary of my experience and qualifications here.

5. 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.

6. 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.

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

8.   I have extensive experience in architecting, developing, optimizing, deploying, and managing complex computing systems, including mobile and wireless computing systems, throughout the world. I have developed mobile and distributed computing systems, including hardware and software for these systems. I have invented, architected, and led the

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