UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TRILLER, INC.,
Petitioner

v.

TIKTOK PTE. LTD.
Patent Owner

Case IPR2022-00179
U.S. Patent No. 9,648,132

DECLARATION OF RAJEEV SURATI, PH.D.

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B. The May 2007 PCT Application provides support for a music application that uses track meta-data that is formed as a separate meta-data layer, is external to a music track, and defines attributes of tracks, to make sharing and browsing of track information possible. 25

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I, Rajeev Surati, Ph.D., of Cambridge, Massachusetts, declare that:

I. INTRODUCTION AND SCOPE OF WORK

1. I have been retained by Patent Owner TikTok PTE. LTD. in the above-captioned *Inter Partes* Review (IPR) proceedings as an independent expert in the relevant field.

2. I have been asked to provide my independent analysis regarding the references identified by petitioner Triller, Inc. ("Petitioner") in IPR proceeding IPR2022-00179 involving U.S. Patent No. 9,648,132 ("the '132 patent") and IPR proceeding IPR2022-00180 involving U.S. Patent No. 9,992,322 ("the '322 patent), which are assigned to Patent Owner. I note that the '322 patent is a continuation of the '132 patent and that the patents share a common specification and priority date. I have been asked to consider what one of ordinary skill in the art before the priority date of the '132 and '322 patents would have understood from the '132 and '322 patents, including scientific and technical knowledge related to the '132 and '322 patents. I have also been asked to consider whether the references relied on by Petitioner disclose or render obvious the inventions claimed by the '132 and '322 patents.

3. My analysis is directed by my education, training, and experience as a person of ordinary skill in the art as of the priority date of the '132 and '322

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patents, which for purposes of my analysis here is assumed to be the filing date of the UK patents to which the '132 and '322 patents claim priority—May 5, 2006.

4. I am being compensated for my work in connection with this IPR proceeding at my standard hourly rate. My compensation is not in any way contingent on the substance of my opinions or the outcome of these proceedings.

II. SUMMARY OF OPINIONS

5. Based on my experience and expertise, discussed below, and my review of the references identified by Petitioner in these IPRs for the '132 and '322 patents, it is my opinion that the cited references do not render obvious the challenged claims of the '132 and '322 patents.

III. BACKGROUND AND QUALIFICATIONS

6. I have more than thirty (30) years of experience in electrical engineering, computer science, and electronic messaging. The following paragraphs summarize some of my experience that is relevant to the technologies described within the '132 and '322 patents. For further details, please refer to my *curriculum vitae* which is attached as Appendix A.

7. I attended the Massachusetts Institute of Technology (MIT) from 1988 to 1999, during which time I earned Bachelor of Science (1992), Master of Science (1995), and Doctor of Philosophy (1999) degrees in electrical engineering and computer science.

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