

Declaration of Sandeep Chatterjee, Ph.D. in Support of
Petition for *Inter Partes* Review of
U.S. Patent No. 9,349,120 B2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FACEBOOK, INC., INSTAGRAM, LLC and WHATSAPP INC.,
Petitioners

v.

BLACKBERRY LIMITED
Patent Owner

U.S. Patent No. 9,349,120 B2
Issue Date: May 24, 2016

Title: System and Method for Silencing Notifications for a Message Thread

DECLARATION OF SANDEEP CHATTERJEE, PH.D.

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(a) “the communication subsystem adapted for receiving the incoming electronic messages; and” (Claim 1[a])	50
(b) “the non-transitory media readable by the data processor comprising coded program instructions adapted to cause the processor to:” (Claim 1[b])	50

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(c) “receive a selected message thread for silencing;” (Claim 1[c])	52
(d) “in response to receiving the selected message thread, activate a flag stored in the non-transitory media in association with the selected message thread, wherein the flag indicates that the selected message thread has been silenced;” (Claim 1[d])	55
(e) “determine that a new incoming electronic message is associated with the selected message thread;” (Claim 1[e])	67
(f) “determine that the selected message thread has been flagged as silenced using the flag stored in the non-transitory media;” (Claim 1[f])	74
(g) “override a currently-enabled notification setting to prevent a receipt notification pertaining to new incoming electronic messages associated with the selected message thread from being activated; and” (Claim 1[g])	75
(h) “display the new incoming electronic message in an inbox together with any message thread not flagged as silenced, while silencing any further notifications pertaining to receipt of the new incoming electronic message, wherein the new incoming message thread flagged as silenced is displayed in the inbox in a different manner than any message thread not flagged as silenced.” (Claim 1[h])	82
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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

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