

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD., SAMSUNG
ELECTRONICS AMERICA, INC., LG ELECTRONICS INC., and LG
ELECTRONICS U.S.A., INC.,
Petitioners,

v.

PARUS HOLDINGS, INC.,
Patent Owner.

Case No. IPR2020-00846 & IPR2020-00847
U.S. Patent No. 7,076,431 & 9,451,084

**DECLARATION OF BENEDICT OCCHIOGROSSO IN SUPPORT OF
PATENT OWNER'S RESPONSE TO *INTER PARTES* REVIEW OF U.S.
PATENT NOS. 7,076,431 & 9,451,084**

Parus Exhibit 2059

TABLE OF CONTENTS

	PAGE
I. INTRODUCTION	1
II. QUALIFICATIONS AND EXPERIENCE.....	2
III. MATERIALS CONSIDERED	10
IV. PERSON OF ORDINARY SKILL IN THE ART	16
V. LEGAL STANDARDS	17
A. Obviousness.....	17
B. Claim Construction.....	19
C. Swearing Behind a Reference	19
VI. PRIOR ART SPEECH-BASED INFORMATION RETRIEVAL SYSTEMS	20
VII. BACKGROUND AND TECHNOLOGY FOR THE '431 AND '084 PATENTS	21
A. Prior Art Interactive Voice Response Systems Suffered From Numerous Drawbacks	21
1. Typical Prior Art Systems For Accessing Web Sites Were Not Sufficiently Portable, Comprehensive, And Affordable	21
2. Voice Enabled Options Introduced Additional Problems and Drawbacks	22
3. Prior Art “Interactive Voice Response” Systems Suffered From A Lack Of Fault Tolerance, Limited Webpage Resources, And Generic Search Options And Results	23
B. The '431 and '084 Patent’s Solutions	26
VIII. THE SOURCE CODE FOR WEBLEY ASSISTANT.....	26
A. '431 Patent.....	27
1. [1.pre] A system for retrieving information from pre- selected web sites by uttering speech commands into a voice enabled device and providing to users retrieved information in an audio form via said voice enabled device, said system comprising:	28

2.	[1.a] a computer, said computer operatively connected to the internet;	29
3.	[1.b] a voice enabled device operatively connected to said computer, said voice enabled device configured to receive speech commands from users;.....	29
4.	[1.c] at least one speaker-independent speech recognition device, said speaker-independent speech recognition device operatively connected to said computer and to said voice enabled device;	30
5.	[1.d] at least one speech synthesis device, said speech synthesis device operatively connected to said computer and to said voice enabled device;.....	30
6.	[1.e] at least one instruction set for identifying said information to be retrieved, said instruction set being associated with said computer, said instruction set comprising: a plurality of pre-selected web site addresses, each said web site address identifying a web site containing said information to be retrieved;	31
7.	[1.f] at least one recognition grammar associated with said computer, each said recognition grammar corresponding to each said instruction set and corresponding to a speech command; said speech command comprising an information request selectable by the user;	31
8.	[1.g] said speaker-independent speech recognition device configured to receive from users via said voice enabled device said speech command and to select the corresponding recognition grammar upon receiving said speech command;.....	32
9.	[1.h] said computer configured to retrieve said instruction set corresponding to said recognition grammar selected by said speaker-independent speech recognition device;	33
10.	[1.i] said computer further configured to access at least one of said plurality of web sites identified by said instruction set to obtain said information to be retrieved,	33

11. [1.j] said computer configured to first access said first web site of said plurality of web sites and, if said information to be retrieved is not found at said first web site, said computer configured to sequentially access said plurality of web sites until said information to be retrieved is found or until said plurality of web sites has been accessed;.....34
12. [1.k] said speech synthesis device configured to produce an audio message containing any retrieved information from said pre-selected web sites, and said speech synthesis device further configured to transmit said audio message to said users via said voice enabled device.35
13. [2.] The system of claim 1 wherein said internet is the Internet.35
14. [4.] The system of claim 1 wherein said voice enabled device is a standard telephone, an IP telephone, a cellular phone, a PDA, a personal computer, a DVD player, a television or other video display device, a CD player, a MP3 player, or any other device capable of transmitting said audio message.....36
15. [5.] The system of claim 1 wherein said speaker-independent speech recognition device is configured to analyze phonemes to recognize said speech commands.....36
16. [6.] The system of claim 1 wherein said speaker-independent speech recognition device is configured to recognize naturally spoken speech commands.37
17. [7.] The system of claim 1 wherein said instruction set further comprises a content descriptor associated with each said web site address, said content descriptor pre-defining a portion of said web site containing said information to be retrieved.....37
18. [9.] The system of claim 1 wherein said computer is further configured to periodically search said internet to identify new web sites and to add said new web sites to said plurality of web sites.37

19.	[10.] The system of claim 1 wherein said instruction set further comprises a ranking associated with each said web site address, said ranking indicating the order in which the plurality of pre-selected web sites are accessed.....	38
20.	[13.] The system in claim 10 wherein said computer is configured to access said plurality of web sites in order of ranking to retrieve said information requested by said user, said computer further configured to first access said web site having the highest ranking.....	38
21.	[14.] The system of claim 1 further comprising a database operatively connected to said computer, said database configured to store said information gathered from said web sites in response to said information requests.....	39
B.	'084 Patent.....	39
1.	[1pre] 1. A system for acquiring information from one or more sources maintaining a listing of web sites by receiving speech commands uttered by users into a voice-enabled device and for providing information retrieved from the web sites to the users in an audio form via the voice-enabled device, the system comprising:	39
2.	[1.a] at least one computing device, the computing device operatively coupled to one or more networks;.....	41
3.	[1.b] at least one speaker-independent speech-recognition device, the speaker-independent speech-recognition device operatively connected to the computing device and configured to receive the speech commands;	41
4.	[1.c] at least one speech-synthesis device, the speech-synthesis device operatively connected to the computing device;	42
5.	[1.d] memory operatively associated with the computing device with at least one instruction set for identifying the information to be retrieved, the instruction set being associated with the computing device, the instruction set comprising:.....	42

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