UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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.

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Case No. IPR2020-00846
Patent No. 7,076,431

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REPLY DECLARATION OF STUART J. LIPOFF

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I, Stuart J. Lipoff, declare:

1. I have reviewed the Patent Owner's Response (Paper 14, "POR") in IPR2020-00846, and portions of the Declaration of Benedict Occhiogrosso (Ex. 2059, "Occhiogrosso-Decl.") cited in the POR. Specifically, I reviewed Sections I-VII and IX of Mr. Occhiogrosso's declaration. I have not been asked to review or opine on Section VIII of Mr. Occhiogrosso's declaration.

I. GROUNDS 1-4: ARGUMENTS REGARDING THE KOVATCH/NEAL COMBINATION

2. I understand that Section IV.B of the POR and Section IX.B of Mr. Occhiogrosso's declaration argue that the Kovatch/Neal combination (discussed, *e.g.*, in Section VII.A.2 of my original declaration, Ex. 1002) does not meet limitation [1.j] of claim 1 of the '431 patent, reciting "access[ing] said first web site…and, if said information to be retrieved is not found…,… sequentially access[ing] said plurality of web sites until said information to be retrieved is found or until said plurality of web sites has been accessed." For the reasons discussed in Section I.A below, I disagree with Parus's and Mr. Occhiogrosso's arguments, and in my opinion a person of ordinary skill in the art ("POSA") would have disagreed.

3. I understand that Section IV.C.1 of the POR and Section IX.C.1 of Mr. Occhiogrosso's declaration argue that a POSA would not have been motivated to make the Kovatch/Neal combination. For the reasons discussed in Section I.B

below, I disagree with Parus's and Mr. Occhiogrosso's arguments, and in my opinion POSA would have disagreed.

A.   Arguments Regarding Neal's Teachings

4.   I understand that Section IV.B.2 of the POR and Section IX.B.2 of Mr. Occhiogrosso's declaration present four arguments related to Neal's teachings. POR, pages 35-40; Occhiogrosso-Decl., ¶¶ 119-129. I disagree with each of these arguments, and in my opinion a POSA would have disagreed, for the reasons discussed below in Sections I.A.1-4.

1.   First Argument

5.   I understand that Parus's and Mr. Occhiogrosso's "[f]irst" argument is that "Neal does not teach accessing web sites." POR, page 37; Occhiogrosso-Decl., ¶ 122. This argument does not address the Kovatch/Neal combination, which does not rely on Neal to teach accessing web sites. *Kovatch* teaches retrieving information from suppliers' websites, and the Kovatch/Neal combination applies to Kovatch's system Neal's *teaching* of sequentially searching different suppliers' electronically stored data in a hierarchical order until the information to be retrieved is found or until the available suppliers have been searched. *See* Ex. 1002 ("Lipoff-Orig-Decl."), ¶ 102 (discussing "Kovatch's context of searching for desired information from various web sites" modified based on Neal's teaching to perform "hierarchical ordering and search").

2. Second Argument

6.   I understand that Parus's and Mr. Occhiogrosso's "[s]econd" argument is that "Neal teaches away from the very keyword search algorithm that the [*sic*] Mr. Lipoff and the Petition identify…for their combination." Occhiogrosso-Decl., ¶ 123; POR, pages 37-38. I disagree, and in my opinion a POSA would have disagreed, for at least two reasons.

7.   ***First***, paragraph 125 of Mr. Occhiogrosso's declaration is incorrect— the Kovatch/Neal combination does ***not*** use a "keyword search algorithm" from Neal to search each individual website. The Kovatch/Neal combination uses ***Kovatch's*** web parsing methodology to search each individual website. *See* Lipoff-Orig.-Decl., ¶¶ 139, 157, 161 (discussing how the Kovatch/Neal combination uses Kovatch's Anita Query Engine and Anita Web Parser to query and retrieve information from each individual website). As I explained in my original declaration, what the Kovatch/Neal combination applies from Neal is Neal's teaching to search supplier data sets sequentially in an order, as Neal's FIG. 2 (reproduced below) illustrates. Lipoff-Orig-Decl., ¶¶ 98-106. Mr. Occhiogrosso's declaration (¶ 125) acknowledges this, where he states that my original declaration "focus[ed] on the search technique where if the match is not found in the first data set, then the same search technique is applied to the next data

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