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, U.S. Patent No. 9,451,084

DECLARATION OF ALEXANDER KURGANOV IN SUPPORT OF PATENT OWNER'S RESPONSE TO *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,076,431 and 9,451,084

Parus Exhibit 2020

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C. Source code archives and emails discussing the project demonstrate the Webley Assistant included the features claimed in the '431 and '084 patents by December 31, 1999. 12

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: 13

2. [1.a] a computer, said computer operatively connected to the internet; 17

3. [1.b] a voice enabled device operatively connected to said computer, said voice enabled device configured to receive speech commands from users; 17

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; 18

5. [1.d] at least one speech synthesis device, said speech synthesis device operatively connected to said computer and to said voice enabled device; 19

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; 21

7. [1.f] at least one recognition grammar associated with said computer, each said recognition grammar corresponding to each said instruction set and

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corresponding to a speech command; said speech command comprising an information request selectable by the user; 24

a. Evidence of the early use of the voice browsing weather grammar on or before 12/31/1999 27

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; 31

9. [1.h] said computer configured to retrieve said instruction set corresponding to said recognition grammar selected by said speaker-independent speech recognition device; 32

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, ...34

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; 35

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. 38

13. [2.] The system of claim 1 wherein said internet is the Internet. 39

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. 41

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15. [5.] The system of claim 1 wherein said speaker-independent speech recognition device is configured to analyze phonemes to recognize said speech commands.....42

16. [6.] The system of claim 1 wherein said speaker-independent speech recognition device is configured to recognize naturally spoken speech commands. 42

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.....44

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. 44

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.....45

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.....45

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.....46

22. [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: 48

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23. [1.a] at least one computing device, the computing device operatively coupled to one or more networks;.....48

24. [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; 48

25. [1.c] at least one speech-synthesis device, the speech-synthesis device operatively connected to the computing device; 48

26. [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:.....48

27. [1.e] a plurality of web site addresses for the listing of web sites, each web site address identifying a web site containing the information to be retrieved;.....49

28. [1.f] at least one recognition grammar associated with the computing device, each recognition grammar corresponding to each instruction set and corresponding to a speech command, the speech command comprising an information request provided by the user, the speaker-independent speech-recognition device configured to receive the speech command from the users via the voice-enabled device and to select the corresponding recognition grammar upon receiving the speech command;.....49

29. [1.g] the computing device configured to retrieve the instruction set corresponding to the recognition grammar provided by the speaker-independent speech-recognition device; 49

30. [1.h] the computing device further configured to access at least one of the plurality of web sites identified by the instruction set to obtain the information to be retrieved, wherein the computing device is further configured to periodically search via the one or more networks to identify new web sites and to add the new web sites to

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