

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. TBD  
Patent No. 7,076,431

---

**DECLARATION OF STUART J. LIPOFF**

Google Exhibit 1002 Google v. Parus
--

## TABLE OF CONTENTS

I.	PERSONAL AND PROFESSIONAL BACKGROUND .....	1
II.	MATERIALS REVIEWED AND CONSIDERED .....	9
III.	MY UNDERSTANDING OF PATENT LAW .....	11
	A. Anticipation .....	12
	B. Obviousness.....	13
IV.	PERSON OF ORDINARY SKILL IN THE ART (“POSA”).....	15
V.	THE ’431 PATENT .....	19
	A. Overview of the Described Technology.....	19
	B. The Challenged Claims .....	30
	C. Prosecution History of the ’431 Patent .....	30
VI.	PRIOR-ART REFERENCES .....	32
	A. Kovatch (Ex. 1005): International Patent Application Publication No. WO 2001/050453 .....	32
	B. Neal (Ex. 1007): U.S. Patent No. 6,324,534 .....	33
	C. Chakrabarti (Ex. 1008): U.S. Patent No. 6,418,433.....	33
	D. DeSimone (Ex. 1009): U.S. Patent No. 5,787,470.....	34
	E. Kurganov-262 (Ex. 1004): U.S. Patent Application Publication No. 2001/0047262 .....	34
VII.	THE CHALLENGED CLAIMS WOULD HAVE BEEN OBVIOUS OVER THE ART IN THE PETITION .....	35
	A. Ground 1: Claims 1-2, 4-7, 10, and 13-14 Would Have Been Obvious over Kovatch in View of Neal .....	35
	1. Kovatch (Ex. 1005) .....	35
	a. Kovatch’s Disclosure .....	37
	b. Kovatch’s Claim 1 is supported by Provisional Application No. 60/174,371 (“Kovatch-Provisional”).....	45
	2. The Kovatch/Neal Combination .....	52

3.	Claim 1 .....	60
	a. [1pre].....	60
	(1) “A system for retrieving information from pre-selected web sites” .....	60
	(2) “by uttering speech commands into a voice enabled device” .....	66
	(3) “and for providing to users retrieved information in an audio form via said voice enabled device” .....	66
	b. [1.a] “a computer, said computer operatively connected to the internet” .....	67
	c. [1.b] “a voice enabled device operatively connected to said computer, said voice enabled device configured to receive speech commands from users” .....	69
	d. [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” .....	69
	e. [1.d] “at least one speech synthesis device, said speech synthesis device operatively connected to said computer and to said voice enabled device” .....	72
	f. [1.e] .....	74
	(1) “at least one instruction set for identifying said information to be retrieved, said instruction set being associated with said computer” .....	74
	(2) “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” .....	79
	g. [1.f].....	81
	(1) “at least one recognition grammar associated with said computer” .....	81
	(2) “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” .....	82
h.	[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” .....	89
i.	[1.h] “said computer configured to retrieve said instruction set corresponding to said recognition grammar selected by said speaker-independent speech recognition device” .....	91
j.	[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” .....	93
k.	[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” .....	93
l.	[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” .....	95
4.	Claim 2: “The system of claim 1 wherein said internet is the Internet” .....	97
5.	Claim 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” .....	97

6.	Claim 5: “The system of claim 1 wherein said speaker-independent speech recognition device is configured to analyze phonemes to recognize said speech commands ” .....	98
7.	Claim 6: “The system of claim 1 wherein said speaker-independent speech recognition device is configured to recognize naturally spoken speech commands ” .....	100
8.	Claim 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” .....	101
9.	Claim 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.” .....	103
10.	Claim 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” .....	104
11.	Claim 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” .....	105
B.	Ground 2: All Challenged Claims Would Have Been Obvious over Kovatch in View of Neal and Chakrabarti .....	107
1.	Chakrabarti .....	107
2.	The Kovatch/Neal/Chakrabarti Combination .....	109
3.	Claim 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.” .....	114
4.	The Kovatch/Neal/Chakrabarti Combination Meets All Challenged Claims .....	114
C.	Ground 3: Claim 14 Would Have Been Obvious over Kovatch in View of Neal and DeSimone .....	116

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.