UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

ZENTIAN LIMITED,
Patent Owner

Inter Partes Review Case No. IPR2023-00037
U.S. Patent No. 10,971,140

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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I. INTRODUCTION

Zentian does not dispute the Petition's combination teaches each of the claim elements. Nor does Zentian dispute the Petition's level of skill for a POSITA or that Mr. Schmandt (Apple's expert) qualifies as a POSITA. Zentian instead argues a lack of motivation to combine for various reasons that are either technically incorrect, overly generalized and not responsive to the Petition's mapping, or are not supported by Federal Circuit caselaw.

II. THE JIANG-CHEN COMBINATION RENDERS OBVIOUS CLAIMS 1(D) AND 1(E)

Zentian incorrectly argues the Petition and Declaration do not "explain how Jiang's tree search engine 74 *modified in view of Chen* would operate to meet limitation 1(d) and 1(e)." (Paper 19, 29) (emphasis original). The Petition specifies "each of the one or more clusters in the modified *Jiang-Chen* circuit would have been configured by a POSITA to include a plurality of processors described by *Chen* performing the techniques described regarding the tree search engine 74 described by *Jiang*, **replicating the tree search engine's functionality amongst each of the plurality of *Chen's* processors**." (Paper 1, 17-18 (emphasis added), 24 (the combination "**would have stored at least a portion of the acoustic model data** (HMM acoustic model from *Jiang's* model memory 72) in the shared cluster memories 104a-d" of the *Chen* clusters), 30 ("*each* of the plurality of processors" of the *Chen* cluster "would have been utilized to perform the probability computations

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