

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

ZENTIAN LIMITED,
Patent Owner.

IPR2023-00037
Patent 10,971,140 B2

Record of Oral Hearing
Held: March 11, 2024

Before KEVIN F. TURNER, JEFFREY S. SMITH, and
CHRISTOPHER L. OGDEN, *Administrative Patent Judges*.

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IPR2023-00037
Patent 10,971,140 B2

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The above-entitled matter came on for hearing Monday, March 11, 2023, commencing at 2:44 p.m. EDT, via Video-conference.

P-R-O-C-E-E-D-I-N-G-S

2:44 p.m.

COURT REPORTER: On the record.

JUDGE OGDEN: Good afternoon. Welcome to the Patent Trial and Appeal Board. This is the hearing for IPR2023-00037, between Petitioner Apple Inc., Amazon Web Services, Inc., and Amazon.com Services LLC, and Patent Owner Zentian Limited, challenging claims in Patent 10,839,798 B2.

And I'm Judge Ogden, and with me today on the panel are Judges Turner and Smith. Judge Smith is joining us remotely.

So I'd like to go through counsel introductions as we did with the prior case this morning. So who is here on behalf of Petitioner Apple?

MS. BAILEY: Thank you, Your Honor. I'm Jennifer Bailey. I'm from the law firm of Erise IP. I have with me my co-counsel, Christina Canino, and in-house counsel for Apple, Jenny Liu.

JUDGE OGDEN: Thank you. And on behalf of Patent Owner?

MR. NOROOZI: Yes, Your Honor. Your Honor, Kayvan Noroozi from Noroozi PC for Patent Owner, and with me are Peter Knops and Jessica Bernhardt.

JUDGE OGDEN: And on behalf of the Amazon Petitioners?

MR. CHURNET: Hello, Your Honor. Dargaye Churnet from Fenwick & West on behalf of Amazon.

JUDGE OGDEN: Thank you. So today, each side will have a total of 45 minutes to present their arguments, and as usual, parties will have the opportunity to reserve rebuttal or surrebuttal time.

1 So we'll begin with Petitioner. Ms. Bailey, would you like to
2 reserve rebuttal time?

3 MS. BAILEY: Yes, Your Honor. I'd like to reserve 15 minutes
4 for rebuttal.

5 JUDGE OGDEN: Okay. We'll put 30 minutes on the clock,
6 and you can begin when you're ready.

7 MS. BAILEY: May it please the board. Thank you, Your
8 Honors.

9 Let's turn first to Petitioner's Demonstrative DX-2, and let's
10 quickly go through the claim. Claim 1 recites a basic distance calculation
11 and search steps using a clustered processor architecture. The basic tree
12 search steps are limitations, 1(d) and 1(e). And I note for limitations 1(d)
13 and 1(e), it says the speech recognition circuit is configured to generate both
14 the initial and final scores. The claim does not require any particular
15 processor to generate the scores, but we'll get into that in a little bit.

16 The claim ends with the tree search score generation. I know
17 that in Claim 1, word recognition is not claimed, what happens to the scores
18 after generation is not claimed, how the final scores are compiled, how the
19 pruning is instructed, and how the word is selected are all not claimed.

20 Turning to DX-3, let's go briefly through the combination.
21 Jiang teaches a tree search algorithm that includes distance calculations and
22 tree search scoring. Jiang's tree search algorithm is per the Petition's
23 mapping, replicated across all of the processors of the clusters of Chen's
24 clustered processor architecture. And I'm happy to provide citations as I go
25 if that would be helpful. So each processor in each cluster is performing the
26 lexical tree search recited in Claims 1(d) and 1(e). In other words, the initial
27 and final score generation.

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