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

DECLARATION OF CHRISTOPHER SCHMANDT IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 10,971,140



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	D.	CLAIM 1 IS RENDERED OBVIOUS BY <i>JIANG</i> IN VIEW OF <i>CHEN</i>			
	-	1. Claim 1			
		a) Claim 1(Pre): "A speech recognition circuit comprisin			
			53		

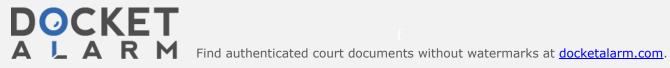


b)	Claim 1(a): "one or more clusters of processors, each of the one or more clusters of processors comprising: a plurality of processors;"
c)	Claim 1(b): "and [one or more clusters of processors, each of the one or more clusters of processors comprising:] an acoustic model memory storing acoustic
d)	model data"
e)	Claim 1(d): "[wherein] the speech recognition circuit is configured to generate an initial score for an audio sample"
f)	Claim 1(e): "[wherein] the initial score is used to determine whether to continue processing to determine a final score via processing a larger amount of model data than that was processed to generate the initial score." 7
	im 2: "wherein the probability is an input to an
3. Clai	uation of a state transition of a model of states"
4. Clai first the f the s that	im 7: "the one or more clusters of processors comprises of cluster of processors and a second cluster of processors; first cluster comprises a first acoustic model memory; and second cluster comprises a second acoustic model memory is distinct and separate from the first acoustic model mory"
NIONS RE	GARDING GROUND 28
CHEN AND 1. Clair a) 2. Clair	3, 5, AND 7-8 ARE RENDERED OBVIOUS BY JIANG IN VIEW Of LUCKE
	c) d) e) f) 2. Clair eval 3. Clair mor proce 4. Clair first the state men NIONS REC CLAIMS 1- CHEN AND 1. Clair a)



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X.	OPINIONS REGARDING GROUND 4		
	A.	CLAIM 4 IS RENDERED OBVIOUS BY JIANG IN VIEW OF CHEN AND ROBINSON 1. Claim 4: "wherein the probability is computed from a Gaussian mixture model and one or more feature vectors."	
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CLAIM LISTING

Claim 1:

Claim 1[Pre] A speech recognition circuit comprising:

1(a): one or more clusters of processors, each of the one or more clusters of processors comprising: a plurality of processors;

1(b): and an acoustic model memory storing acoustic model data,

1(c): wherein each of the plurality of processors is configured to compute a probability using the acoustic model data in the acoustic model memory,

1(d): wherein: the speech recognition circuit is configured to generate an initial score for an audio sample;

1(e): and the initial score is used to determine whether to continue processing to determine a final score via processing a larger amount of model data than that was processed to generate the initial score.

Claim 2

The speech recognition circuit of claim 1, wherein the probability is an input to an evaluation of a state transition of a model of states.

Claim 3

The speech recognition circuit of claim 2, wherein the model is a Hidden Markov Model.

Claim 4



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