

Filed on behalf of:

AMAZON WEB SERVICES, INC.  
AND AMAZON.COM SERVICES LLC,

By:

J. DAVID HADDEN, Reg. No. 40,629  
SAINA SHAMILOV, Reg. No. 48,266  
DARGAYE CHURNET, Reg. No. 71,288  
FENWICK & WEST LLP  
801 California Street  
Mountain View, CA 94041  
Telephone: 650.988.8500  
Facsimile: 650.938.5200

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

AMAZON WEB SERVICES, INC.  
AND AMAZON.COM SERVICES LLC,  
Petitioners,

v.

ZENTIAN LIMITED  
Patent Owner.

Case No. IPR2023-01197  
Patent No. 10,971,140

**PETITIONERS' REPLY<sup>1</sup> TO PATENT OWNER'S PRELIMINARY  
RESPONSE AND CONTINGENT JOINDER OPPOSITION**

---

<sup>1</sup> The Board authorized Petitioners to file this Reply in an email sent November 1,  
2023.

**TABLE OF CONTENTS**

	<b>Page</b>
I. <i>FINTIV</i> FACTORS 1-5 FAVOR INSTITUTION UNDER THE DISTRICT COURT'S NEW CASE SCHEDULE.....	1
II. <i>FINTIV</i> FACTOR 6: REQUIRING A <i>SOTERA</i> STIPULATION IS "INAPPROPRIATE" AND PREJUDICIAL TO PETITIONERS.....	2

**EXHIBIT LIST (37 C.F.R. § 42.63(E))**

<b>Exhibit</b>	<b>Description</b>
<b>1001</b>	U.S. Patent No. 10,971,140 (“’140 Patent”)
<b>1002</b>	Prosecution History for the 10,971,140 Patent (“’140 File History”)
<b>1003</b>	Declaration of Christopher Schmandt (“Dec.”)
<b>1004</b>	U.S. Patent No. 6,374,219 to Jiang (“Jiang”)
<b>1005</b>	U.S. Patent No. 5,428,803 to Chen et al. (“Chen”)
<b>1006</b>	Hsiao-Wuen Hon, <i>A survey of hardware architectures designed for speech recognition</i> , Carnegie Mellon University, 1991 (“Hon”)
<b>1007</b>	Ph.D. Thesis of Mosur Ravishankar (“Ravishankar”)
<b>1008</b>	U.S. Patent Application Publication No. 2001/0053974 to Lucke et al. (“Lucke”)
<b>1009</b>	U.S. Patent No. 5,983,180 to Robinson (“Robinson”)
<b>1010</b>	U.S. Patent No. 5,036,539 to Wrench Jr., et al. (“Wrench”)
<b>1011</b>	Frederick Jelinek, <i>Statistical Methods for Speech Recognition</i> , The MIT Press, 1997 (“Jelinek”)
<b>1012</b>	Christopher Schmandt, <i>Voice Communication with Computers</i> , Van Nostrand Reinhold, 1994 (“Schmandt”)
<b>1013</b>	Lawrence Rabiner and Biing-Hwang Juang, <i>Fundamentals of Speech Recognition</i> , Prentice Hall PTR, 1993 (“Rabiner”)
<b>1014</b>	Richard Klevans and Robert Rodman, <i>Voice Recognition</i> , Artech House, 1997 (“Klevans”)
<b>1015</b>	U.S. Patent No. 7,120,582 to Young et al. (“Young”)
<b>1016</b>	John Holmes and Wendy Holmes, <i>Speech Synthesis and Recognition</i> , 2nd Edition, Taylor & Francis, 2001 (“Holmes”)
<b>1017</b>	U.S. Patent No. 4,926,488 to Nadas et al. (“Nadas”)

Exhibit	Description
1018	U.S. Patent No. 6,182,037 to Maes (“ <i>Maes</i> ”)
1019	U.S. Patent Application Publication No. 2003/0220796 to Aoyama et al. (“ <i>Aoyama</i> ”)
1020	U.S. Patent No. 6,092,045 to Stublely et al. (“ <i>Stublely</i> ”)
1021	U.S. Patent No. 6,151,574 to Lee et al. (“ <i>Lee</i> ”)
1022	U.S. Patent No. 6,580,814 to Ittycheriah et al. (“ <i>Ittycheriah</i> ”)
1023	U.S. Patent No. 6,452,348 to Toyoda (“ <i>Toyoda</i> ”)
1024	William A. Wulf and C.G. Bell, <i>C.mmp—A multi-mini-processor</i> , Carnegie-Mellon University, 1972 (“ <i>Wulf</i> ”)
1025	Lee D. Erman, Richard D. Fennell, Victor R. Lesser, and D. Raj Reddy, <i>System Organizations for Speech Understanding: Implications of Network and Multiprocessor Computer Architectures for AI</i> , IEEE Transactions on Computers, Vol. C-25, No. 4, April 1976 (“ <i>Erman</i> ”)
1026	U.S. Patent No. 6,393,481 to Deo et al. (“ <i>Deo</i> ”)
1027	U.S. Patent No. 6,615,338 to Tremblay et al. (“ <i>Tremblay</i> ”)
1028	U.S. Patent No. 5,922,076 to Garde (“ <i>Garde</i> ”)
1029	Lawrence R. Rabiner, <i>A Tutorial on Hidden Markov Models and Selected Applications in Speech Recognition</i> , Proceedings of the IEEE, Vol. 77, No. 2, February 1989 (“ <i>Rabiner 89</i> ”)
1030	[RESERVED]
1031	[RESERVED]
1032	Zentian, Ltd. v Apple Inc. WDTX Waco (6:22-cv-122) Scheduling Order “ <i>Scheduling Order</i> ”
1033	Declaration of June Ann Munford (“ <i>Munford</i> ”)
1034	[RESERVED]
1035	[RESERVED]

<b>Exhibit</b>	<b>Description</b>
<b>1036</b>	<i>[RESERVED]</i>
<b>1037</b>	<i>[RESERVED]</i>
<b>1038</b>	<i>[RESERVED]</i>
<b>1039</b>	<i>[RESERVED]</i>
<b>1040</b>	<i>[RESERVED]</i>
<b>1041</b>	<i>[RESERVED]</i>
<b>1042</b>	<i>[RESERVED]</i>
<b>1043</b>	Declaration of Les Atlas, Ph.D.
<b>1044</b>	<i>Zentian Ltd. v. Amazon.com Services LLC, et al.</i> , No. 6:22-cv-123 (W.D. Tex.) Mar. 22, 2023 Amended Scheduling Order

# 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.