Exhibit A

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,

Petitioner,

v.

JAWBONE INNOVATIONS, LLC,

Patent Owner.

Patent No. 11,122,357 Filing Date: August 5, 2013 Issue Date: September 14, 2021

Inventor: Gregory C. Burnett
Title: FORMING VIRTUAL MICROPHONE ARRAYS USING
DUAL OMNIDIRECTIONAL MICROPHONE ARRAY (DOMA)

PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2023-01130



IPR2023-01130 PATENT NO. 11,122,357

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IV. V. VI.	LEV	EL OF UME	ONSTRUCTIONFORDINARY SKILL IN THE ART	7 7	
	В.		nd 1: Brandstein and Gannot Do Not Render Obvious ns 1-20 Petitioner's Combination Does Not Disclose or Render	8	
		1.	Obvious "wherein the first virtual microphone and the second virtual microphone are distinct virtual directional microphones with substantially similar responses to noise and substantially dissimilar response to speech" as recited in independent Claims 1 and 15		
		2.	Petitioner Does Not Identify Any Motivation to Combine Embodiments and References Within Brandstein	14	
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TABLE OF AUTHORITIES

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EXHIBIT LIST

Exhibit No.	Description of Document
2001	Order Granting Dismissal with Prejudice, Jawbone
	Innovations, LLC v. Amazon.com Inc., No. 3:22-cv-06727-
	TLT, Dkt. 107 (N.D. Cal. Jul. 26, 2023)
2002	Declaration of Akbar M. Sayeed, Ph.D.
2003	Curriculum Vitae of Akbar M. Sayeed, Ph.D.
2004	Excerpts of MICROPHONE ARRAYS: SIGNAL PROCESSING
	TECHNIQUES AND APPLICATIONS, Ch. 18, Future Directions
	in Microphone Array Processing (Michael Brandstein &
	Darren Ward eds., Springer-Verlag 2001) ("Brandstein")



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