

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.
Petitioner

v.

IXI IP, LLC
Patent Owner

Case No. IPR2016-01669
Patent 7,552,124

**DECLARATION OF LIN CHASE, PH.D., IN SUPPORT OF
PATENT OWNER'S PRELIMINARY RESPONSE**

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1.	<i>Pazandak</i> , <i>White</i> , and <i>Manson</i> do not disclose or suggest "wherein the high-level code is provided by a user ...	

	without having to select from menu items ...” as alleged by Petitioner	32
2.	<i>Pazandak, White</i> and <i>Manson</i> do not disclose or suggest “parsing the high-level code for the keywords ...” as alleged by Petitioner	35
3.	<i>Pazandak, White</i> and <i>Manson</i> do not disclose or suggest “determining whether high-level code comprises keywords defining one or more relationships and conditions corresponding to the operative language” as alleged in the Petition.....	37
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5.	A person of ordinary skill in the art would not have been motivated to modify <i>Pazandak</i> in view of <i>White</i> as alleged by Petitioner	41

I, Lin Chase, Ph.D., do hereby declare:

I. INTRODUCTION

A. Engagement

1. I have been retained by counsel for Patent Owner as an expert witness to render opinions on certain issues concerning *Inter Partes* Review No. IPR2016-01669 of U.S. Patent No. 7,552,124 to Vladimir Drukin (hereafter “the ’124 Patent”). This is my written declaration.

B. Compensation and Prior Testimony

2. I am being compensated at a standard rate of \$375 per hour for my study and preparation of this declaration. I am also being reimbursed for reasonable and customary expenses associated with my work and testimony in this study. This compensation is not dependent on my opinions or testimony or the outcome of this matter.

3. I have previously testified as an expert in the following matters:

Nuance Communications, Inc. v. Vlingo Corp, United States District Court, D. Mass., 09-11414-RWZ, and *Ultratec, Inc., et al. v. Sorenson Comm., Inc., et al.*, W.D. Wisc., 3:14-cv-00066-JDP.

C. Qualifications and Professional Experience

4. I am currently Chief Executive Officer (CEO) of Big Tech Strategy.

5. I received a Bachelor of Science degree in Physics in 1985, a Master of Science degree in Computer Science in 1992, and a Doctor of Philosophy degree in Computer Science in 1997, all from Carnegie Mellon University. My Ph.D. thesis was entitled “Error-Responsive Feedback Mechanisms for Speech Recognizers.”

6. From 1993 to 1997, I worked as the President of Human Language Systems, LLC in Pittsburgh, PA. Human Language Systems provided consulting services in speech and natural language processing technology. At Human Language Systems, I was responsible for providing strategic consulting, project management, and implementation services for speech recognition, natural language understanding, and spoken language systems to a number of private corporations and public institutions.

7. In 1998, I worked as a Researcher for LIMSI/CNRS, Université Paris XI, a French National Research Laboratory in Orsay, France. There, I performed research in spoken language understanding systems in French and English.

8. From 1999 to 2001, I worked as the Director of Operations, EMEA for SpeechWorks International, which provided spoken and natural language interactive systems for call center and telecommunications automation. I founded the European division of SpeechWorks International, eventually growing the

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