

**EXPERT DECLARATION OF DR. KEVIN NEGUS
FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 6,757,718**

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I. INTRODUCTION

1. I, Dr. Kevin Negus, submit this declaration in support of a Petition for *Inter Partes* Review of United States Patent Nos. 6,757,718 (the “718 Patent”), owned by IPA Technologies L.L.C. (“IPA” or “Patent Owner”). I have been retained in this matter by Baker Botts LLP (“Counsel”) on behalf of DISH Network L.L.C. (“Petitioner”). Petitioner DISH Network L.L.C. and DISH Network Corporation (“DISH”) are the Real Parties-in-Interest to this Petition. DISH is a provider of direct broadcast satellite (DBS) services.

2. I make this declaration based upon my personal knowledge. I am over the age of 21 and am competent to make this declaration.

3. The statements herein include my opinions and the bases for those opinions, which relate to at least the following documents of the pending *inter partes* review petition:

- U.S. Patent No. 6,742,021 by Christine Halverson, Luc Julia, Dimitris Voutsas, and Aden J. Cheyer, entitled “Navigating Network-Based Electronic Information Using Spoken Input with Multimodal Error Feedback” (the “021 Patent”) (Ex. 1001).
- File History for U.S. Patent No. 6,742,021 (Ex. 1002).
- U.S. Patent No. 6,757,718 by Christine Halverson, Luc Julia, Dimitris Voutsas, and Adam Cheyer, entitled “Mobile Navigation of Network-Based Electronic Information Using Spoken Input” (the “718 Patent”) (Ex. 1003).
- File History for U.S. Patent No. 6,757,718 (Ex. 1004).
- U.S. Patent No. 6,523,061 by Christine Halverson, Luc Julia, Dimitris Voutsas, and Adam Cheyer, entitled “System, Method, and Article of Manufacture for Agent-Based Navigation in a Speech-Based Data Navigation System” (the “061 Patent”) (Ex. 1005).
- File History for U.S. Patent No. 6,523,061 (Ex. 1006).

- U.S. Patent No. 6,851,115 by Christine Halverson, Luc Julia, Dimitris Voutsas, and Adam Cheyer, entitled “Software-Based Architecture for Communication and Cooperation Among Distributed Electronic Agents” (the “115 Patent”) (Ex. 1007).
- File History for U.S. Patent No. 6,851,115 (Ex. 1008).
- File History for U.S. Patent Application No. 60/124,720 (Ex. 1009).
- File History for U.S. Patent Application No. 60/124,719 (Ex. 1010).
- File History for U.S. Patent Application No. 60/124,718 (Ex. 1011).
- U.S. Patent No. 5,500,920 by Julian M. Kupiec, entitled “Semantic Co-occurrence Filtering for Speech Recognition and Signal Transcription Applications” (“Kupiec”) (Ex. 1013).
- U.S. Patent No. 6,006,227 by Eric Freeman et al., entitled “Document Stream Operating System” (“Freeman”) (Ex. 1014).
- U.S. Patent No. 5,247,580 by Toshiyuki Kimura et al., entitled “Voice-operated remote control system” (“Kimura”) (Ex. 1015).
- Complaint, *IPA Technologies Inc. v. DISH Network Corp. et al.*, No. 1:16-cv-01170 (D. Del.) (“District Court Litigation”) (Ex. 1016).
- Non-patent literature publication by Adam J. Cheyer and Luc Julia, entitled “Multimodal Maps: An Agent-based Approach” (“Cheyer”) (Ex. 1019).

4. My materials considered for forming my opinions herein have included at least the above-referenced documents.

5. Although I am being compensated for my time at a rate of \$500 per hour in preparing this declaration, the opinions herein are my own, and I have no stake in the outcome of

the review proceeding. My compensation does not depend in any way on the outcome of the Petitioner's petition.

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