

Petition for *Inter Partes* Review of U.S. Patent No. 6,757,718

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

In Re: U.S. Patent 6,757,718 : Attorney Docket No. 081841.0113
Inventor: Christine Halverson *et al.* :
Filed: June 30, 2000 :
Issued: June 10, 2004 : IPR No.: Unassigned
Assignee: IPA Technologies Inc.
Title: Mobile Navigation of Network-Based Electronic Information using
Spoken Input

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**PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1-4, 6, 8-9, 10-13,
15, 17-18, 19-22, 24, AND 26-27 OF U.S. PATENT NO. 6,757,718 UNDER 35
U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.100 *ET SEQ.***

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 A. *Level of Ordinary Skill in the Art*26

 B. *Preambles of independent claims 1, 10, and 19 are limiting.*26

 C. *“navigation query” (Claims 1, 4, 10, 13, 19, and 22)*27

 D. *“mobile information appliance” (Claims 1-3, 8, 10, 12, 17, 19, 21, and 26)*28

 E. *“mobile information appliance comprises a portable remote control device or a set-top box for a television” (Claims 1, 10, and 19)*29

VI. A REASONABLE LIKELIHOOD EXISTS THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE30

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LIST OF EXHIBITS

1001	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”
1002	File History for U.S. Patent No. 6,742,021
1003	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”
1004	File History for U.S. Patent No. 6,757,718
1005	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”
1006	File History for U.S. Patent No. 6,523,061
1007	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”
1008	File History for U.S. Patent No. 6,851,115
1009	File History for U.S. Patent Application No. 60/124,720
1010	File History for U.S. Patent Application No. 60/124,719
1011	File History for U.S. Patent Application No. 60/124,718
1012	Declaration of Dr. Kevin Negus
1013	U.S. Patent No. 5,500,920 by Julian M. Kupiec, entitled “Semantic Co-occurrence Filtering for Speech Recognition and Signal Transcription Applications” (“ <i>Kupiec</i> ”)
1014	U.S. Patent No. 6,006,227 by Eric Freeman <i>et al.</i> , entitled “Document Stream Operating System” (“ <i>Freeman</i> ”)

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1015	U.S. Patent No. 5,247,580 by Toshiyuki Kimura et al., entitled “Voice-operated remote control system” (“ <i>Kimura</i> ”)
1016	Complaint, <i>IPA Technologies Inc. v. DISH Network Corp. et al.</i> , No. 1:16-cv-01170 (D. Del.) (“District Court Litigation”)
1017	Proof of Service of Complaint on DISH Network L.L.C. and DISH Network Corporation
1018	Source Code Appendix to U.S. Patent No. 5,500,920 by Julian M. Kupiec
1019	Non-patent literature publication by Adam J. Cheyer and Luc Julia, two of the named inventors on the ’061 Patent, entitled “Multimodal Maps: An Agent-based Approach” (“Cheyer”), first published on May 26, 1995.
1020	Non-patent literature publication by Sankyu Park et. al, citing Cheyer article, entitled “A Framework for Multi-Agent Systems with Multimodal User Interfaces in Distributed Computing Environments,” published in 1997.
1021	Non-patent literature publication by Yi Han and Ingrid Zukerman, citing Cheyer article, entitled “A Mechanism for Multimodal Presentation Planning Based on Agent Cooperation and Negotiation,” published in 1997.
1022	Non-patent literature publication by Andrew Kehler et al., citing Cheyer article, entitled “On Representing Salience and Reference in Multimodal Human-Computer Interaction,” published in 1998.
1023	Non-patent literature publication by Philip Cohen et al., citing Cheyer article, entitled “QuickSet: Multimodal Interaction for Distributed Applications,” published in 1997.
1024	Non-patent literature publication by Jean-Claude Martin, citing Cheyer article, entitled “Towards ‘intelligent’ cooperation between modalities. The example of a system enabling multimodal interaction with a map,” published in 1997.

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