PARUS

APPLE INC.,
Petitioner,

v.

PARUS HOLDINGS, IN

Patent Owner

IPR2020-00686; Patent 7,076,43

IPR2020-00687; Patent 9,451,08

Paper 25 – Order Setting Oral Argu

Grounds

IPR2020-00686

Ground	Reference	Basis	Ch
I	*Ladd, Kurosawa,* and *Goedken*	§103	1-6
II	*Ladd, Kurosawa, Goedken,* and *Madnick*	§103	7, 1
III	*Ladd, Kurosawa, Goedken,* and *Houser*	§103	5 a
IV	*Ladd, Kurosawa, Goedken,* and *Rutledge*	§103	9 a

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IV	*Ladd, Kurosawa, Goedken,* and *Rutledge*	§103	1-6
V	*Ladd, Kurosawa, Goedken, Rutledge,* and *Madnick*	§103	7
VI	*Ladd, Kurosawa, Goedken, Rutledge,* and *Houser*	§103	5 a

"Speaker Independent Speech Rec

- All Grounds Fail Because The Petition Does Not Ide
  Teaches The "at least one speaker-independent sp
  said speaker-independent speech recognition devi
  said computer and to said voice enabled device" Li
  Challenged Claim

  - The Petition does not establish that Claim 1(c) is t
    of Ladd, Kurosawa, and Goedken or by any other

  - As mapped by the Petition, Claim 1(c) reads as fo

  - At least one speaker-independent speech recogn
    independent speech recognition device operative
    computer and to said voice enabled device

Every Ground Of The Petition Relies On Ladd To Teach Speech Recognition Device (Petition

- Ladd's disclosure of speaker-independent speech recognition significantly inferior to the speaker-independent speech recognition disclosed by the '431 and '084 Patents, therefore the speech recognition disclosed or taught by Ladd.

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