UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WHATFIX INC.,
Petitioner,

v.

WALKME LTD.,
Patent Owner.

Case IPR2023 - 01368

Patent No. 11,819,664 B2

NOTICE OF SERVICE OF SUPPLEMENTAL EVIDENCE PURSUANT TO 37 CFR § 42.64(b)(2)

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P.O. Box 1450
Alexandria, VA 22313-1450

EXHIBIT LIST

EXHIBIT NO.	DESCRIPTION
Ex2001	Expert Declaration of Ivan Zatkovich in Support of Patent Owner's Response with respect to Claims 1-9, 12-16, 18-23, 25-26, 28-31, 33 of U.S. Patent No. 11,819,664 ("**Original Declaration**")
Ex2002	*Curriculum Vitae* of Ivan Zatkovich
Ex2003	Deposition Transcript of Homayoon Beigi, taken on June 26, 2024
Ex2004	Deposition Transcript of Homayoon Beigi, taken on June 27, 2024
Ex2005	Public Comments to S. Symons, "When Chatbots meet RPA bots," https://medium.com/roborana/when-chatbots-meet-rpa-bots-c8b22579f49a, Medium (Oct. 19, 2017) (omitted by Petitioner in Ex1004)
Ex2006	Zatkovich's Overview of Ex2009, "Simple chatbot" .html Code, and Ex2010, Video of "Simple chatbot" .html Code
Ex2007	Khoros Staff, "Different types of chatbots: Rule-based vs. NLP", Expert insights, Aug. 29, 2019 (marked as Beigi Ex. 19)
Ex2008	IBM, "What is a chatbot?", https://web.archive.org/web/20221227051852/https://www.ibm.com/topics/chatbots (archived copy of Dec. 27, 2022).

EXHIBIT NO.	**DESCRIPTION**
Ex2009	"Simple chatbot" .html Code, Prepared by Mr. Zatkovich for use in IPRs 2023-01368, 2023-01379, 2024-00065.
Ex2010	Video demonstration of the "Simple chatbot" .html Code (Ex2009)
Ex2011	[RESERVED]
Ex2012	U.S. Patent No. 11,258,732 [Ex1001 in IPR2023-01379]
Ex2013	U.S. Patent No. 11,558,317 [Ex1001 in IPR2024-00065]
Ex2014	**Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR § 42.64 (b)(2) In Response To Petitioner's Objection to Evidence and Providing Supplemental Evidence for *Inter Partes* Review of Claims 1-20 of U.S. Patent No. 11,558,317**
Ex2015	**Comment of Neha Negi to S. Symons, "When Chatbots Meet RPA Bots", Medium (Posted Sep. 10, 2018) (available at: https://medium.com/@nehanegi0230/hi-saw-the-video-but-wanted-to-know-how-does-the-chatbot-trigger-the-rpa-bot-2804de1ace4c)**
Ex2016	**Comment of Sachin Prakish to S. Symons, "When Chatbots Meet RPA Bots", Medium (Posted June 9, 2018) (available at: https://medium.com/@sachinprakash.37/which-rpa-tool-and-chatbot-tool-are-you-used-and-give-description-to-do-this-automation-a4d4cc0e2193)**

EXHIBIT NO.	**DESCRIPTION**
Ex2017	**Comment of Esteban to S. Symons, "When Chatbots Meet RPA Bots", Medium (Posted April 24, 2018) (available at: https://medium.com/@egalicia_coconutt/ interesting-but-i-seems-that-rpa-is-a-simply-program-d3bbb7c333df)**
Ex2018	**June 19, 2021 archive of Khoros Staff, "Different types of chatbots: Rule-based vs. NLP", Expert insights (Aug. 29, 2019) (accessible at: https://web.archive.org/web/20210619072226/ https://khoros.com/blog/different-kinds-of-chatbots)**

*** New Exhibits identified in Bold.**

On July 8, 2024, Patent Owner WalkMe Ltd. ("Patent Owner") filed and served Paper 19, Patent Owner's Response for Inter Partes Review of Claims 1-9, 12-16, 18-23, 25-26, 28-31, 33 of U.S. Patent No. 10,819,664 B2, along with Ex2001-Ex2013. On July 15, 2024, Petitioner Whatfix Inc. ("Petitioner"), filed and served Paper 20, Petitioner's Objection to Evidence Submitted with Patent Owner's Response, objecting to, *inter alia*, Ex2005 and Ex2007.

Patent Owner hereby provides notice that, in accordance with 37 CFR § 42.64(b)(2), Patent Owner is serving the following supplemental evidence to address certain objections of Petitioner:

- Supplemental Declaration of Ivan Zatkovich Pursuant to 37 CFR § 42.64 (b)(2) In Response To Petitioner's Objection to Evidence and Providing Supplemental Evidence for *Inter Partes* Review of Claims 1-20 of U.S. Patent No. 11,558,317 (Ex2014)
- Comment of Neha Negi to S. Symons, "When Chatbots Meet RPA Bots", Medium (Posted Sep. 10, 2018) (available at: https://medium.com/@nehanegi0230/hi-saw-the-video-but-wanted-to-know-how-does-the-chatbot-trigger-the-rpa-bot-2804de1ace4c) (Ex2015)
- Comment of Sachin Prakish to S. Symons, "When Chatbots Meet RPA Bots", Medium (Posted June 9, 2018) (available at:

https://medium.com/@sachinprakash.37/which-rpa-tool-and-chatbot-tool-are-you-used-and-give-description-to-do-this-automation-a4d4cc0e2193) (Ex2016)

- Comment of Esteban to S. Symons, "When Chatbots Meet RPA Bots", Medium (Posted April 24, 2018) (available at: https://medium.com/@egalicia_coconutt/interesting-but-i-seems-that-rpa-is-a-simply-program-d3bbb7c333df) (Ex2017)
- June 19, 2021 archive of Khoros Staff, "Different types of chatbots: Rule-based vs. NLP", Expert insights (Aug. 29, 2019) (accessible at: https://web.archive.org/web/20210619072226/https://khoros.com/blog/different-kinds-of-chatbots) (Ex2018)

For completeness of the record, copies of Ex2014-Ex2018 that are being served as supplemental evidence are being submitted and recorded.

Respectfully submitted,

Dated: July 29, 2024
New York, New York

By: /*Charles R. Macedo*/

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing **NOTICE OF SERVICE OF SUPPLEMENTAL EVIDENCE PURSUANT TO 37 CFR § 42.64(b)(2)** was caused to be served on July 29, 2024 via electronic mail on the following counsel of record for Patent Owner:

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