

Preliminary Ineligibility Contentions for U.S. Patent 8,886,536

Pursuant to Chief Judge Gilstrap's Standing Order Regarding Subject Matter Eligibility Contentions, the following charts contain Samsung's Preliminary Ineligibility Contentions demonstrating that claims 1-55 of U.S. Patent No. 8,886,536 ("536 patent") are patent-ineligible under 35 U.S.C. § 101. Because the Court has yet to issue a claim construction in this case, and to the extent Plaintiff contends that there are factual disputes that relate to eligibility of the asserted claims of the '536 patent, fact and expert discovery is ongoing, these contentions are preliminary only and Samsung reserves the right to supplement or modify these contentions in accordance with the agreed patent-disclosure procedures and the Docket Control Order in this case. Additionally, and in further consideration of the preliminary stages of the case, Samsung notes that the pinpoint citations referenced in this chart are not exhaustive, and Samsung reserves the right to rely on additional citations within the asserted patent any cited reference. Furthermore, citations to any figure, table, or chart are meant to encompass the language describing the figure, table, or chart, and vice versa. To the extent applicable, Samsung incorporates by reference its citations in its eligibility contentions for the other asserted patents, which are related to the '536 patent.

To the extent applicable, Samsung further incorporates by reference its citation in the § 102/103 contentions, which illustrate that the claimed elements were well-understood, routine, and conventional.

Further, these charts may incorporate Plaintiff's apparent interpretation of the breakdown of elements within the asserted claims, as reflected in Plaintiff's infringement contentions to date. Samsung does not concede that such interpretation is correct, and reserves its right to supplement these contentions accordingly.

Samsung reserves its right to supplement these contentions based on further discovery, including any supplemental infringement contentions or to any interrogatory response provided by Plaintiff purporting to rebut these ineligibility contentions.

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Defendants’ Invalidity Contentions – Appendix G-6

Pursuant to Judge Gilstrap’s Standing Order Regarding Subject Matter Eligibility Contentions, Samsung provides the following chart identifying each exception to eligibility (e.g., abstract idea, law of nature, and natural phenomenon) to which each Challenged Claim is directed and the factual and legal basis therefor, as well as identification of whether one or more of the Challenged Claims are representative of any other Challenged Claims. Samsung incorporates by reference the prior art identified in the ’536 patent, the prosecution history of the ’536 patent, any related litigations, and any related PTAB proceedings. Samsung further incorporates by reference any prior art identified or to be identified in its invalidity contentions and/or expert reports that will be provided according to the schedule provided by the Court’s Docket Control Order (Dkt. No. 42).

Challenged Claims	Exception to Eligibility
Claims 1-55	Each of the independent claims of the ’536 patent are directed to the abstract idea of selecting and presenting advertisements based on natural language processing. This is not a technological advancement in the art, but a form of tailoring information based on provided data, such as was ruled abstract in <i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015). That the supposed tailoring of information results in a targeted advertisement is no matter since, as the Federal Circuit held in <i>Bridge & Post, Inc. v. Verizon Commc’ns, Inc.</i>, 778 F. App’x 882, 887 (Fed. Cir. 2019), targeted marketing or advertising simply using technological solutions does not escape the conclusion that the claim is directed to anything more than an abstract idea. <i>See also Customedia Technologies, LLC v. Dish Network Corp.</i>, 951 F.3d 1359 (Fed. Cir. 2020) (technology that merely improves the abstract ideal of targeted advertising is abstract). Accordingly, the patent is subject to the “abstract idea” exception to patent eligibility under the Patent Act as construed by the Supreme Court in <i>Alice</i>. <u>Representativeness</u> As an initial matter, for the purpose of the <i>Alice</i> inquiry, Claim 44 is representative of all asserted claims of the ’536 patent. VBA asserts all claims (1-55) of the ’536 patent, which includes independent claims 1, 32, 33, 36-39, 43-44, 49-50, and 53-55. Claim 44 discloses the common set of steps that undergird each of the other independent claims, namely: (1) Receiving a first and second natural language utterance, (2) Performing speech

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	recognition to identify requests, (3) Involving multiple devices to process the user’s requests, (4) Determining promotional content related to the requests, and (5) Presenting the promotional content to a user. The other independent and dependent claims do not alter the analysis as the dependent claims are substantially are substantially similar, if not substantially identical, and linked to the same abstract idea. See Content Extraction & Transmission LLC v. Wells Fargo Bank, Nat. Ass’n, 776 F.3d 1343, 1348 (Fed. Cir. 2014). For instance, the patent claims include both method claims (e.g., 1, 33, 37, 39, 44, 50, 54) that have system counterparts (e.g., 32, 36, 38, 43, 49, 53, 55). The difference is simply whether the patent claim is framed as “a computer-implemented method” or “a system” with processors configured to perform that method. Other independent and dependent claims include minor variations on the claimed limitations that do not relate to the substance of the invention. For instance, some claims explicitly add a third utterance (e.g., re-interpretation in Claims 7, 13, 33, etc.), Some claims use “domain agents” and interpretation scores (Claims 1, 5–6), whereas others highlight user profile categories (Claims 30–31, 50–55). Some claims specify monitoring user interaction with the ads or seeking clarifications (Claims 24, 37–38). Some claims revolve around distributing requests across different apps or devices and then linking relevant promotional content (Claims 25–29, 39–49). As detailed above, all of the asserted dependent claims merely narrow the scope of the independent claims to use specific modalities or decision processes for obtaining the same

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	abstract idea claimed in the independent claims. Because these limitations do not provide any additional inventive concept, their eligibility under 101 rises and falls with the independent claims. <u>The ’536 Patent Claims an Abstract Idea</u> In <i>Beteiro, LLC v. DraftKings Inc.</i>, the Federal Circuit recently identified certain “well-settled indicators of abstractness.” 104 F. 4th 1350, 1355 (Fed. Cir. 2024). These are: (1) claims that broadly recite generic steps; (2) claims drafted using largely result-focused functional language, and (3) claims that can be analogized to “longstanding ‘real-world’ activities. <i>Id.</i> While each of these indicators are sufficient to demonstrate abstractness, the claims of the ’536 patent exhibit all of the features identified by that court. <i>First</i>, the claims are broad and cite generic steps. In considering the breadth and genericness of the claims, the focus must be on the actual claims. <i>See ChargePoint, Inc. v. SemaConnect, Inc.</i>, 920 F.3d 759, 769 (Fed. Cir. 2019) (“[T]he § 101 inquiry must focus on the language of the Asserted Claims themselves” (quoting <i>Synopsys, Inc. v. Mentor Graphics Corp.</i>, 839 F.3d 1138, 1149 (Fed. Cir. 2016))); <i>Alice</i>, 573 U.S. at 219, 134 S.Ct. 2347 (“On their face, the claims before us are drawn to the concept of intermediated settlement” (emphasis added)). When evaluating the claim language, the court must evaluate “the ‘focus of the claimed advance over the prior art’ to determine if the claim’s ‘character as a whole’ is directed to excluded subject matter.” <i>Intell. Ventures I LLC v. Erie Indem. Co.</i>, 850 F.3d 1315, 1325 (Fed. Cir. 2017) (quoting <i>Affinity Labs of Tex., LLC v. DIRECTV, LLC</i>, 838 F.3d 1253, 1257 (Fed. Cir. 2016)). While claim 44 of the ’536 patent includes extraneous verbiage designed to provide a perception of technological advance and complexity of the alleged invention in an attempt to remove it from the realm of ineligible subject matter, it is at bottom a claim over the following six-step process: (1) Receiving a first and second natural language utterance, (2) Performing speech recognition and identifying requests, (3) Involving multiple devices to interpret the

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	user’s requests, (4) Determining promotional content related to the requests, and (5) Presenting the promotional content to a user. These steps—receiving a message, detecting information, and generating and transmitting a response—are <i>exactly</i> the type of steps that the Federal Circuit has “frequently” held to be abstract. <i>See, e.g., AI Visualize, Inc. v. Nuance Commc’ns, Inc.</i>, 97 F.4th 1371, 1378 (Fed. Cir. 2024) (“We have explained that the steps of obtaining, manipulating, and displaying data, particularly when claimed at a high level of generality, are abstract concepts.”); <i>Elec. Power Grp. LLC v. Alstom S.A.</i>, 830 F.3d 1350, 1354 (Fed Cir. 2016) (finding “a process of gathering and analyzing information of a specified content, then displaying the results” abstract); <i>Intell. Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015) (finding “tailoring content based on the [user’s] location” abstract); <i>buySAFE, Inc. v. Google, Inc.</i>, 765 F.3d 1350, 1355 (Fed. Cir. 2014) (claiming “a computer receiv[ing] and send[ing] information over a network – with no further specification – is not even arguably inventive”). <i>Second</i>, the claims are drafted using largely result-focused functional language that “contain[s] no specificity about how the purported invention achieves those results.” <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th 1350, 1356 (Fed. Cir. 2024). As the Federal Circuit has observed “Claims of this nature are almost always found to be ineligible for patenting under Section 101.” <i>Id.</i> (citing <i>Elec. Power Grp.</i>, 830 F.3d at 1356 (“[T]he essentially result-focused, functional character of claim language has been a frequent feature of claims held ineligible under § 101, especially in the area of using generic computer and network technology to carry out economic transactions.”); <i>Two-Way Media Ltd. v. Comcast Cable Commc’ns, LLC</i>, 874 F.3d 1329, 1337 (Fed. Cir. 2017) (“The claim requires the functional results of ‘converting,’ ‘routing,’ ‘controlling,’ ‘monitoring,’ and ‘accumulating records,’ but does not sufficiently describe how to achieve these results in a non-abstract way.”)). More specifically, claim 44 of the 536 patent employs purely functional claiming because it describes the intended results of various components without specifying any particular structure or algorithm for achieving those results. The claim recites broad functional language, such as

Challenged Claims	Exception to Eligibility
	“receiving, at the one or more physical processors, a first natural language utterance”, “providing, by the one or more physical processors, a response to the first natural language utterance”, and “determining, by the one or more physical processors, promotional content that relates to one or more of the” requests, but does not disclose <i>how</i> these tasks are performed beyond referencing generic components, such as the claimed “physical processor”. By failing to define specific implementation details, Claim 44 merely states desired functional outcomes without limiting itself to a particular technical solution, thereby preempting all possible implementations rather than claiming a specific inventive concept. <i>Third</i>, the claims are directly analogous to “longstanding ‘real-world’ (‘brick-and-mortar’) activities.” <i>Beteiro, LLC v. DraftKings Inc.</i>, 104 F.4th at 1356; <i>see also PersonalWeb Techs. LLC v. Google LLC</i>, 8 F.4th 1310, 1316 (Fed. Cir. 2021) (claims that “can be performed in the human mind” or “using a pencil and paper” are “a telltale sign of abstraction”); <i>Intell. Ventures I LLC v. Symantec Corp.</i>, 838 F.3d 1307, 1314 (Fed. Cir. 2016) (a claimed method’s similarity to “fundamental ... practices long prevalent” is yet another clue that the claims may be abstract and unpatentable). More specifically, the ’536 patent simply describes the process of selecting and presenting an advertisement that is responsive to a voice input. That is, of course, what salespersons do every day. That the patent claims performing this process using electronic devices and speech recognition software or hardware does not change the ultimate conclusion that the patent is directed to the abstract idea of selecting and presenting advertisements based on natural language processing. Indeed, the Federal Circuit has repeatedly held that a patent is directed to an abstract idea when the claimed invention simply automates via computer a process that has been and can be effectuated by humans. <i>See CyberSource Corp., v. Retail Decisions, Inc.</i>, 654 F.3d 1366, 1373 (Fed. Cir. 2011). <i>See also Voter Verified, Inc. v. Election Sys. & Software LLC</i>, 887 F.3d 1376, 1385 (Fed. Cir. 2018) (holding patent claims directed to auto-verification of a ballot to be abstract because “[h]umans have performed [the act of voting] . . . for hundreds of years.”); <i>Repifi Vendor Logistics, Inc. v. IntelliCentrics, Inc.</i>, 2022 WL 794981, *2-3 (Fed. Cir. 2022) (claims were “directed to the abstract idea of credentialing visitors and checking them in and

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	out”—a “long-standing human process” (quotation marks omitted)); <i>CardioNet, LLC v. InfoBionic, Inc.</i> , 816 F. App’x 471, 476–77 (Fed. Cir. 2020) (measuring heart data claims abstract because process “could otherwise be performed by a human”); <i>Perry St. Software, Inc. v. Jedi Techs., Inc.</i> , 548 F. Supp. 3d 418, 432 (S.D.N.Y. 2021) (“Jedi seeks to apply these age-old processes to the context of internet chatrooms. But facilitating human interactions or relationships – which could occur offline and without automation – is not a patent-eligible idea. It is, as Judge Sleet found in connection with Jedi’s earlier patents, nothing more than the mechanization of traditional processes designed to satisfy humanity’s desire for companionship.”)

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Pursuant to Judge Gilstrap’s Standing Order Regarding Subject Matter Eligibility Contentions, Samsung provides the following chart identifying a description of the industry, at the relevant time, in which the Challenged Claims are alleged to be well understood, routine, and conventional, and the factual and legal basis therefor; and a description of how each element of each Challenged Claim, both individually and in combination with the other elements of that claim, was well understood, routine, and conventional, in the relevant industry at the relevant time, and the legal and factual basis therefor.¹

The claims of the ’536 patent amount to nothing more than the practice of an abstract idea using conventional (even as of 2006) electronics. Such claims are not eligible for patent under current Section 101 jurisprudence. *See, e.g., Alice*, 573 U.S. at 223, 134 S.Ct. 2347 (“[T]he mere recitation of a generic computer cannot transform a patent-ineligible abstract idea into a patent-eligible invention.”); *BSG Tech.*, 899 F.3d at 1290-91 (“If a claim’s only ‘inventive concept’ is the application of an abstract idea using conventional and well-understood techniques, the claim has not been transformed into a patent-eligible application of an abstract idea.”). Accordingly, the district court rightly dismissed the complaints.

Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
[1pre] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when	The concept of providing promotional content related to natural language utterances and/or responses using a computer system was well understood, routine, and conventional in the relevant industry at the relevant time. The ’536 patent confirms that the claimed computer system is nothing more than generic hardware and software performing conventional functions, rather than any specialized or improved computing architecture:

¹ Samsung notes that under Supreme Court and Federal Circuit precedent, the Court need not, and should not, consider whether each and every element of each Challenged Claim was well understood, routine, and conventional. Rather, the only elements which should be considered under *Alice* step 2 are the elements that fall outside the scope of the abstract idea. *See Alice Corp. v. CLS Bank Int’l*, 573 U.S. 208, 221-224 (2014); *BSG Tech LLC v. BuySeasons, Inc.*, 899 F.3d 1281, 1290 (Fed. Cir. 2018) (“It has been clear since *Alice* that a claimed invention’s use of the ineligible concept to which it is directed cannot supply the inventive concept that renders the invention ‘significantly more’ than that ineligible concept.”).

Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
executed, perform the method, the method comprising:	“Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors. A machine-readable medium may include any mechanism for storing or transmitting information in a form readable by a machine (e.g., a computing device). For example, a machine-readable storage medium may include read only memory, random access memory, magnetic disk storage media, optical storage media, flash memory devices, and others, and a machine-readable transmission media may include forms of propagated signals, such as carrier waves, infrared signals, digital signals, and others. Further, firmware, software, routines, or instructions may be described in the above disclosure in terms of specific exemplary aspects and implementations of the invention, and performing certain actions. However, it will be apparent that such descriptions are merely for convenience and that such actions in fact result from computing devices, processors, controllers, or other devices executing the firmware, software, routines, or instructions.” (’536 patent at 11:63 to 12:16). This passage makes clear that the implementation is entirely generic and relies on standard computing devices, processors, and machine-readable media that perform known functions. There is no disclosure of any specialized hardware, novel software implementation, or improved technical functionality that distinguishes the claimed method from conventional computing systems. Further, providing promotional content based on user input has long been a fundamental principle of targeted advertising and content delivery systems. The idea that a system could analyze natural language input and generate relevant promotional content is a known application of well-established techniques for content recommendation, keyword-based advertising, and automated marketing systems.

Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
	There is no technical disclosure or explanation about how the claimed system determines, selects, or presents promotional content beyond the broad assertion that it is related to a natural language utterance or response. The claim does not describe any novel algorithm, ranking system, or method of improving content targeting that was not already well understood at the relevant time. Thus, the claimed method of providing promotional content related to natural language utterances and/or responses was well understood, routine, and conventional in the relevant industry, and the claimed computer system relies entirely on generic computing components performing known functions.
[1A] receiving, at the one or more physical processors, a first natural language utterance;	The concept of receiving a natural language utterance at a processor was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that the claimed system relies on generic input devices and conventional computing hardware, rather than any specialized or improved architecture: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone).” ('536 patent at 3:52–56). These passages confirm that the system does not introduce any novel means of receiving input—it merely describes the use of a microphone or other conventional input device, which was standard for natural language processing systems at the relevant time.

Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
	Additionally, the '536 patent confirms that the claimed method runs on entirely generic computing hardware and software: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63 to 12:16). This passage establishes that the claimed system is simply executing software instructions on standard processors, rather than involving any specialized computing architecture or improved method for receiving natural language input. Moreover, automatic speech recognition (ASR) systems were well known and widely available at the time of filing, and were described as commodity products: Q. And that software section, let’s go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon’s counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)).

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	This confirms that ASR systems were widely available and did not involve any novel implementation at the time of filing. The claimed method simply applies existing ASR technology, without improving how utterances are received or processed. Thus, the claimed method of receiving a natural language utterance at a processor was well understood, routine, and conventional in the relevant industry, and the claimed system relies entirely on generic computing components performing known functions.
[1B] providing, by the one or more physical processors, a response to the first natural language utterance;	The '536 patent confirms that the claimed system relies on standard computing components and output methods, with no novel implementation or technical improvement: “Conversational language processor 120 may generate a domain-specific conversational response, which may be returned to the user as an output 180. Output 180 may include a multi-modal output (e.g., by simultaneously returning a voice-based response and displaying information on a display device).” (’536 patent at 4:18-23). Further, the '536 patent states that presenting a response to a user follows conventional techniques and can be done in various standard ways: “The output presented to the user in operation 325 may be provided to the user in various ways. For example, in various implementations, the output may include a voice-based or otherwise audible response. In another example, when an associated device includes a display mechanism, the output may be displayed on the display device. It will be apparent that many combinations or variants thereof may be used,

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	such as augmenting a voice-based response with information on a display device.” (’536 patent at 10:57-65). These passages confirm that the claimed method does not describe any novel approach to generating or delivering a response—it merely applies conventional multi-modal response methods that were already standard in natural language processing systems. Additionally, Freeman and Baldwin (2006) disclose that systems generating responses based on user input were already well known, particularly in the context of adaptive responses: "As in a human conversation, the response of the system should be based on how confident the system is that its conclusion is correct. If it is certain, it should just execute the request. If it is less than certain but the range of choice is few or none, it should execute. If it is less than certain and the choices are many, it should ask." Under oath, Mr. Freeman confirmed that this concept of an adaptive response corresponds to the limitations in the claim: Q. And this marketing paper where you describe these principles that Mr. Grice had laid out, this is essentially the '681 patent in ordinary language, right? A. So this is '681 but '681 takes this to a machine, as opposed to human to human. (Trial Tr. 289:20-24, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)).

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	Furthermore, Mr. Freeman confirmed that the concept of adaptive response was derived from Mr. Grice’s work: Q. And adaptive response, that also came from Mr. Grice's paper? A. Correct. (Trial Tr. 289:17-19, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Thus, the claimed method of providing a response to a natural language utterance was well understood, routine, and conventional in the relevant industry at the time of filing, and the claimed system relies entirely on generic computing components performing known functions.
[1C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance;	The concept of receiving a second natural language utterance relating to a prior utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that the claimed system relies on generic input devices and conventional computing hardware, rather than any specialized or improved architecture: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone).” ('536 patent at 3:52–56). This passage makes clear that the system does not introduce any novel means of receiving input—it merely describes the use of a microphone or other

Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
	conventional input device, which was standard for natural language processing systems at the relevant time. Additionally, the '536 patent establishes that the claimed method runs on entirely generic computing hardware and software: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63 to 12:16). This confirms that the claimed system is simply executing software instructions on standard processors, rather than involving any specialized computing architecture or improved method for handling multiple utterances. This passage establishes that conversational systems were already designed to handle sequential user interactions, including responding to follow-up utterances. Additionally, Freeman and Baldwin (2006) confirm that conversation-based processing—wherein multiple utterances build upon previous ones—was well known and follows a shared knowledge model: "There is also long-term shared knowledge which is user-centric rather than session-based such as who they are, their preferences, history of what they've done and said, and where they have been. In a conversational speech system both the system and the user share assumptions and expectations such as: Topic knowledge

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	Conversation history Word usage and jargon Tone (e.g., formal, humorous, terse) The ability to make corrections without interrupting flow." This passage confirms that handling follow-up utterances in a conversation is a standard feature of interactive systems that rely on long-term and short-term shared knowledge. Moreover, automatic speech recognition (ASR) systems were well known and widely available at the time of filing, and were described as commodity products: Q. And that software section, let's go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). This confirms that ASR systems were widely available and did not involve any novel implementation at the time of filing. The claimed method simply applies existing ASR technology to process multiple utterances within the same conversation, which was already a well-known capability.

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	Thus, the claimed method of receiving a second natural language utterance relating to a first utterance was well understood, routine, and conventional in the relevant industry, and the claimed system relies entirely on generic computing components performing known functions.
[1D] performing, by the one or more physical processors, speech recognition to recognize one or more words of the second natural language utterance;	The specification’s only corresponding disclosure for the claimed “speech recognition” is a disclosed “Automatic Speech Recognizer.” 176 patent at 3:39-43. That Automatic Speech Recognizer references unrelated prior art systems, which themselves reference unrelated prior art systems. The concept of performing speech recognition to recognize words in a natural language utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that the claimed system relies on generic computing hardware and software to process speech, without any specialized implementation: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63 to 12:16). This passage establishes that the claimed method simply executes speech recognition software on generic processors, rather than involving any new computing architecture or technological advancement.

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	Additionally, speech recognition was already a commodity technology at the time of filing, as admitted under oath: Q. And that software section, let’s go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon’s counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). This testimony confirms that ASR systems were widely available and did not involve any novel implementation at the time of filing. The claimed method merely applies existing ASR technology to recognize words in a second utterance, a function ASR engines were already designed to perform. Furthermore, the '536 patent describes receiving and processing voice input using conventional methods: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone).” ('536 patent at 3:52–56).

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	This passage makes clear that the system does not introduce any novel means of performing speech recognition—it merely uses conventional input devices and processing techniques that were already widely implemented. Thus, the claimed method of performing speech recognition to recognize words in a second natural language utterance was well understood, routine, and conventional in the relevant industry at the time of filing, and the claimed system relies entirely on generic computing components performing known functions.
[1E] determining, by the one or more physical processors, domain information for the one or more recognized words based on the first natural language utterance;	The concept of determining domain information for recognized words based on a prior utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that the claimed system relies on generic computing hardware and software to process speech, without any specialized implementation: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors. A machine-readable medium may include any mechanism for storing or transmitting information in a form readable by a machine (e.g., a computing device).” ('536 patent at 11:63-12:3). This passage makes clear that the claimed method merely executes software instructions on generic processors, rather than improving how domain information is determined. The so-called physical processor referenced in the claims is entirely

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	generic, with no disclosed improvements or optimizations beyond conventional processing functions. Additionally, speech recognition and domain classification were already commodity technologies at the time of filing, as admitted under oath: Q. And that software section, let's go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). This testimony confirms that ASR systems were widely available and did not involve any novel implementation at the time of filing. The claimed method merely applies existing ASR technology to determine domain information based on prior utterances, which was a known function of conversational processing systems. Furthermore, the '536 patent describes receiving and processing voice input using conventional methods:

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	“System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone).” (’536 patent at 3:52–56). This passage confirms that the system does not introduce any novel means of processing spoken input or determining domain information—it merely applies conventional input devices and computational techniques that were already standard. Additionally, the ’536 patent does not define “domain information” but refers instead to “domain knowledge”: “For example, as described in U.S. patent application Ser. No. 11/200,164, an environmental model may be accessed to determine user location, user activity, track user actions, and/or other environmental information to invoke context, domain knowledge, preferences, and/or other cognitive qualities to enhance the interpretation of questions and/or commands.” (’536 patent at 5:25-31). To the extent that "domain information" and "domain knowledge" are the same, the specification provides no details on how such information is actually "determined." Instead, it merely cites unrelated prior art describing environmental modeling without disclosing any specific method for how domain information is extracted, structured, or applied in practice. Thus, the claimed method of determining domain information for recognized words based on a prior utterance was well understood, routine, and conventional in the relevant industry at the time of filing, and the claimed system relies entirely

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	on generic computing components, including a standard physical processor, performing known functions.
[1F] processing, by the one or more physical processors, based on the domain information, the one or more recognized words to determine an interpretation of the second natural language utterance, wherein processing the one or more recognized words comprises:	The concept of processing recognized words based on domain information to determine an interpretation of a natural language utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that the claimed system relies entirely on generic computing hardware and software, without any specialized or improved computing technology: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors. A machine-readable medium may include any mechanism for storing or transmitting information in a form readable by a machine (e.g., a computing device).” ('536 patent at 11:63-12:3). This passage makes clear that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. There is no disclosure of any specialized or optimized processing techniques that would distinguish this method from conventional computing. Additionally, speech recognition and interpretation using domain-specific data were already commodity technologies at the time of filing, as admitted under oath: Q. And that software section, let’s go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time.

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	During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). This testimony confirms that ASR systems and the processing of recognized words to generate an interpretation were widely available and did not involve any novel implementation at the time of filing. Furthermore, the '536 patent does not define "domain information" but instead refers to "domain knowledge": “For example, as described in U.S. patent application Ser. No. 11/200,164, an environmental model may be accessed to determine user location, user activity, track user actions, and/or other environmental information to invoke context, domain knowledge, preferences, and/or other cognitive qualities to enhance the interpretation of questions and/or commands.” ('536 patent at 5:25-31). To the extent that "domain information" and "domain knowledge" are the same, the specification provides no details on how such information is actually "determined." Instead, it merely cites unrelated prior art describing environmental

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	modeling, without disclosing any specific method for how domain information is structured, applied, or used to refine natural language interpretation. Thus, the claimed method of processing recognized words based on domain information to determine an interpretation of a natural language utterance was well understood, routine, and conventional in the relevant industry at the time of filing, and the claimed system relies entirely on generic computing components, including a standard physical processor, performing known functions.
[1G] providing the one or more recognized words to a first domain agent associated with a first domain and a second domain agent associated with a second domain;	The concept of providing recognized words to multiple domain agents for processing was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent describes domain agents in broad, functional terms, without any disclosure of how they actually operate, reinforcing that they function in a conventional manner: “Conversational language processor 120 may build long-term and/or short-term shared knowledge in one or more knowledge sources. For example, shared knowledge sources may include information about previous utterances, requests, and other user interactions to inform generating an appropriate response to a current utterance. The shared knowledge may include public/non-private (i.e., environmental) knowledge, as well as personal/private (i.e., historical) knowledge. For example, conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest-scoring interpretation). As such, agents 135 may model various domains (e.g., navigation, music, a specific user, global

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	users, advertising, e-commerce, etc.), and conversational language processor 120 may interpret and/or respond to a voice-based input accordingly.” (’536 patent at 4:42-59). While this passage references domain agents competing to generate interpretations, it does not explain how this competition occurs, how the scoring works, or what criteria are used to select an interpretation. The lack of technical detail suggests that these agents function in a conventional manner, relying on known domain classification methods rather than any novel advancement. Additionally, the specification suggests that the domain agents are part of the conversational language processor, which trial testimony confirms was known art: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor was already known, and the specification suggests that the domain agents operate within that system, the claimed method of providing recognized words to a first and second domain agent relies entirely on pre-existing technology without offering any technical improvement. There is no disclosure of any specific structure, algorithm, or novel processing technique for how the domain agents process or compete over interpretations. Thus, the claimed method of providing recognized words to a first and second domain agent was well understood, routine, and conventional in the relevant

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	industry at the time of filing. The claimed system merely applies conventional domain classification techniques within a known conversational language processor, without introducing any new or improved functionality.
[1H] obtaining a first interpretation of the second natural language utterance from the first domain agent;	The concept of obtaining an interpretation of a natural language utterance from a domain-specific processing module was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent states that domain agents operate within a conversational language processor, which trial testimony confirms was already known: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the domain agents are merely components within that system, obtaining an interpretation from a domain agent involves nothing more than applying pre-existing domain classification methods. The specification provides no details on how the interpretation is generated, further suggesting that this is a conventional function. As has been discussed at length, obtaining interpretations of natural language utterances was well known at the time, as automatic speech recognition (ASR) was already a commodity technology: Q. And that software section, let’s go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time.

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	During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Thus, obtaining a first interpretation from a domain agent simply applies conventional ASR and domain classification techniques within a known system, offering no new technological advancement.
[11] obtaining a second interpretation of the second natural language utterance from the second domain agent; and	The concept of obtaining a second interpretation of a natural language utterance from different domain agents was well understood, routine, and conventional in the relevant industry at the relevant time. As has been discussed at length, obtaining interpretations of natural language utterances was well known at the time, as automatic speech recognition (ASR) was already a commodity technology: Q. And that software section, let's go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes.

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	Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Additionally, the '536 patent states that domain agents operate within a conversational language processor, which trial testimony confirms was already known: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and domain agents are merely components within that system, obtaining a second interpretation from another domain agent involves nothing more than applying pre-existing domain classification methods. The specification does not explain how these agents generate interpretations, further suggesting that this is a conventional function using known techniques.
[1J] determining the interpretation based on one or more of the first interpretation or the second interpretation;	The concept of selecting an interpretation from multiple competing interpretations was well understood, routine, and conventional in the relevant industry at the relevant time.

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	As has been discussed at length, obtaining interpretations of natural language utterances was well known at the time, as automatic speech recognition (ASR) was already a commodity technology: Q. And that software section, let's go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time. (Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Additionally, the '536 patent states that domain agents operate within a conversational language processor, which trial testimony confirms was already known: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)).

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	The '536 patent describes domain agents producing competing interpretations but does not explain how a final interpretation is selected: “Conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest-scoring interpretation).” ('536 patent at 4:42-59). While this passage states that domain agents competitively generate interpretations, it does not disclose how scoring occurs, what criteria are used, or what specific algorithm determines the best interpretation. The lack of technical detail suggests that this is a conventional function relying on known techniques for ranking possible interpretations rather than any novel advancement.
[1K] determining, by the one or more physical processors, promotional content based on the interpretation; and	The concept of determining promotional content based on an interpretation of a natural language utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent states that advertisements may be selected and presented in any way, without specifying any particular method or technical improvement: “Other techniques and features of selecting and presenting advertisements based on voice-based inputs may suitably be employed, as would be apparent.” ('536 patent at 7:24-26). “It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” ('536 patent at 10:37-39).

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	These passages confirm that the patent does not disclose any specific technical method for selecting promotional content—instead, it generically states that "various techniques" may be used, which suggests that the claimed functionality relies entirely on conventional targeted advertising methods. As the Federal Circuit has repeatedly held, functional claims that do not describe how targeted advertising is performed are simply directed to the abstract idea of targeted advertising: “Targeted marketing is a form of ‘tailoring information based on [provided] data,’ which we have previously held is an abstract idea.” (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015)). “Selecting advertisements based on context is a form of targeted marketing.” (<i>Bridge & Post, Inc. v. Verizon Commc’ns, Inc.</i>, 778 F. App’x 882, 887 (Fed. Cir. 2019)). Here, the claims merely recite selecting advertisements based on a voice-based input but fail to describe how this is accomplished, what criteria are used, or any technological improvement to targeted advertising. Furthermore, the claimed method runs entirely on generic computing hardware and software, as confirmed by the '536 patent itself: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3).

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	This passage makes clear that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. Thus, the claimed method of determining promotional content based on an interpretation is well understood, routine, and conventional. The lack of any disclosed technical method for selecting promotional content further confirms that the claims are directed to the abstract idea of targeted advertising, rather than any technological advancement. Other extrinsic sources are consistent: Measuring The Effects And Effectiveness Of Interactive Advertising: A Research Agenda Paul A. Pavlou and David W. Stewart <i>Journal of Interactive Advertising</i>, Vol 1 No 1 (Fall 2000), pp. 62-78. Soe-Tsyr Yuan, Y.W. Tsao, A recommendation mechanism for contextualized mobile advertising, <i>Expert Systems with Applications</i>, Volume 24, Issue 4, 2003, Pages 399-414, ISSN 0957-4174. Gediminas Adomavicius, Ramesh Sankaranarayanan, Shahana Sen, and Alexander Tuzhilin. 2005. Incorporating contextual information in recommender systems using a multidimensional approach. <i>ACM Trans. Inf. Syst.</i> 23, 1 (January 2005), 103–145. Intelligent Techniques for Web Personalization IJCAI 2003 Workshop, ITWP 2003, Acapulco, Mexico, August 11, 2003, Revised Selected Papers Conference proceedings © 2005

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[1L] presenting, by the one or more physical processors, the promotional content to a user.	The concept of presenting promotional content to a user was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that advertisements may be presented in any conventional format, without specifying any novel technical method: “The advertisements may include graphically-based advertisements that include banners, images, audio, video, or any suitable combination thereof. Furthermore, the advertisements may include interactive or embedded information, such as links, metadata, or computer-executable instructions, or any suitable combination thereof.” ('536 patent at 5:59-64). This passage demonstrates that the claimed method merely applies existing digital advertising formats rather than introducing any new way to present promotional content. Additionally, the '536 patent states that advertisements may be selected and presented in any way, further confirming that the claim lacks a specific implementation: “Other techniques and features of selecting and presenting advertisements based on voice-based inputs may suitably be employed, as would be apparent.” ('536 patent at 7:24-26). “It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” ('536 patent at 10:37-39).

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	As the Federal Circuit has repeatedly held, functional claims that do not describe how targeted advertising is performed are simply directed to the abstract idea of targeted advertising: “Targeted marketing is a form of ‘tailoring information based on [provided] data,’ which we have previously held is an abstract idea.” (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015)). “Selecting advertisements based on context is a form of targeted marketing.” (<i>Bridge & Post, Inc. v. Verizon Commc’ns, Inc.</i>, 778 F. App’x 882, 887 (Fed. Cir. 2019)). Furthermore, the claimed method runs entirely on generic computing hardware and software, as confirmed by the '536 patent itself: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3). This passage makes clear that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. Thus, the claimed method of presenting promotional content to a user is well understood, routine, and conventional. The lack of any disclosed technical method for presenting promotional content further confirms that the claims are directed to the abstract idea of targeted advertising, rather than any technological advancement.

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[2pre] The method of claim 1, wherein the first natural language utterance and the second natural language utterance are received during an interactive session between the user and the computer system, the method further comprising:	The concept of receiving multiple natural language utterances during an interactive session between a user and a computer system was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that user input, including voice-based utterances, may be received using conventional input devices, without any novel implementation: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone). In various implementations, input device 105 may include a multi-modal input, such as a touch-screen interface, keypad, or other input.” ('536 patent at 3:52-59). This passage establishes that the receipt of multiple utterances during an interactive session is a conventional function of natural language processing systems and does not involve any specialized computing techniques. Additionally, the '536 patent confirms that the method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3).

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	This passage makes clear that the claimed system merely executes conventional software instructions on standard computing components rather than improving how interactive sessions are processed. Furthermore, handling multiple utterances during an interactive session was a well-known feature of conversational systems, as confirmed by the trial testimony that a conversational language processor was already known: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Critically, the specification is silent as to what constitutes an "interactive session" or how such a session is managed beyond the mere receipt of multiple utterances. There is no discussion of how an interactive session is defined, initiated, maintained, or structured, reinforcing that the term is used in a generic, conventional sense rather than describing any technical advancement. Since the conversational language processor was known, and the receipt of multiple utterances within a session is an inherent function of such systems, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of receiving multiple utterances during an interactive session is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for processing interactive sessions, reinforcing that they are directed to the abstract idea of natural language processing using standard computing components.

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[2A] determining, by the one or more physical processors, an activity relating to one or more of the first natural language utterance or the second natural language utterance,	The concept of determining an activity related to a natural language utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that advertisements may be selected based on various conventional factors, including an “activity associated with the request,” but it does not define what constitutes an activity or how it is determined: “Thus, advertisements may be selected in operation 320 using various techniques, including content of the request, an activity/action associated with the request, user profiles, user preferences, statistical metrics, advertiser-specified criteria, to advance a conversation, to resolve ambiguous requests, or in various other ways, as will be apparent.” ('536 patent at 10:46-56). This passage makes clear that the concept of determining an activity related to an utterance is broad and undefined, with no disclosed method for how the system identifies or processes an activity. Instead, the specification merely lists general factors that may be used in selecting advertisements without providing any technical details on how activities are determined. Additionally, the '536 patent confirms that the claimed method runs on entirely generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium,

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	which may be read and executed by one or more processors.” (’536 patent at 11:63-12:3). This passage makes clear that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. Furthermore, the specification does not define how the system determines an "activity" related to an utterance, reinforcing that this step relies on conventional processing rather than any novel technical advancement. The claim does not specify whether the activity is user behavior, inferred intent, or an external action, nor does it disclose any algorithm for determining an activity from speech input. Thus, the claimed method of determining an activity related to a natural language utterance is well understood, routine, and conventional. The lack of any disclosed technical method for determining activities further confirms that the claims are directed to the abstract idea of analyzing user input using conventional computing components.
[2B] wherein determining the promotional content comprises determining the promotional content based on the activity.	The concept of determining promotional content based on an identified activity was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that advertisements may be selected using various conventional factors, including an “activity associated with the request,” without disclosing any specific method for how the activity is determined or how it influences ad selection:

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	“Thus, advertisements may be selected in operation 320 using various techniques, including content of the request, an activity/action associated with the request, user profiles, user preferences, statistical metrics, advertiser-specified criteria, to advance a conversation, to resolve ambiguous requests, or in various other ways, as will be apparent.” (’536 patent at 10:46-56). This passage establishes that the selection of advertisements based on activity is a known approach in targeted advertising and that the specification fails to provide any novel technical implementation beyond general references to common selection techniques. Additionally, as the Federal Circuit has repeatedly held, functional claims that do not describe how targeted advertising is performed are simply directed to the abstract idea of targeted advertising: “Targeted marketing is a form of ‘tailoring information based on [provided] data,’ which we have previously held is an abstract idea.” (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015)). “Selecting advertisements based on context is a form of targeted marketing.” (<i>Bridge & Post, Inc. v. Verizon Commc’ns, Inc.</i>, 778 F. App’x 882, 887 (Fed. Cir. 2019)). Furthermore, the ’536 patent states that selecting and presenting advertisements may be done in any conventional way, further demonstrating the lack of any specific technical implementation:

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	“Other techniques and features of selecting and presenting advertisements based on voice-based inputs may suitably be employed, as would be apparent.” (’536 patent at 7:24-26). “It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” (’536 patent at 10:37-39). These passages confirm that the claimed method merely applies existing targeted advertising techniques rather than introducing any technological improvement. Additionally, the ’536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” (’536 patent at 11:63-12:3). This passage further confirms that the claimed system merely executes conventional software instructions on standard computing components rather than improving how promotional content is selected based on activity. Thus, the claimed method of determining promotional content based on an activity is well understood, routine, and conventional. The lack of any disclosed technical method for determining promotional content further confirms that the claims are

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	directed to the abstract idea of targeted advertising, rather than any technological advancement.
[3A] The method of claim 1, further comprising:	
[3B] determining, by the one or more physical processors, context information for the one or more recognized words based on the first natural language utterance,	The concept of determining context information for recognized words based on a prior utterance was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent describes context determination but provides no specific details on how it is performed, instead broadly stating that various conventional techniques may be used: “Conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest-scoring interpretation).” ('536 patent at 4:42-59). While this passage references context determination, it fails to disclose how context information is actually determined, what criteria are used, or what specific algorithm is applied, reinforcing that this is a conventional function rather than a novel advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be

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	implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” (’536 patent at 11:63-12:3). This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any context determination performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Thus, the claimed method of determining context information for recognized words based on a prior utterance is well understood, routine, and conventional. The claims provide no specific technical details on how context is determined, further confirming that this step merely applies conventional natural language processing techniques rather than introducing any technological improvement.
[3C] wherein the interpretation is determined further based on the context information.	The concept of determining an interpretation based on context information was well understood, routine, and conventional in the relevant industry at the relevant time.

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	The '536 patent broadly describes context determination but fails to disclose any specific technical method for how context information is used to influence interpretation: “Conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest-scoring interpretation).” ('536 patent at 4:42-59). While this passage mentions scoring and selecting interpretations based on context, it does not specify how context is factored into the interpretation process, what scoring criteria are used, or any particular algorithm for determining context-based interpretations. The lack of technical detail strongly suggests that this is a conventional function relying on well-known methods rather than any novel advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3).

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	This passage further confirms that the claimed system merely executes conventional software instructions on standard computing components rather than improving how interpretations are determined based on context. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any context-based interpretation performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how context information is actually applied, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of determining an interpretation based further on context information is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for processing context in interpretation, further confirming that they are directed to the abstract idea of natural language interpretation using standard computing components.
[4] The method of claim 1, wherein the first interpretation is determined by the first domain agent based on the first domain, and wherein the second interpretation is determined by the	The concept of determining multiple interpretations of a natural language utterance based on different domains was well understood, routine, and conventional in the relevant industry at the relevant time.

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second domain agent based on the second domain.	The '536 patent describes domain agents generating interpretations but does not disclose any specific technical method for how these interpretations are generated or how domain-specific information influences interpretation: “Conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest-scoring interpretation). As such, agents 135 may model various domains (e.g., navigation, music, a specific user, global users, advertising, e-commerce, etc.), and conversational language processor 120 may interpret and/or respond to a voice-based input accordingly.” ('536 patent at 4:42-59). While this passage mentions domain agents generating interpretations, it does not explain how different domains affect interpretation, what criteria are used to distinguish between domains, or how domain-specific information is processed. The lack of technical detail strongly suggests that this is a conventional function relying on pre-existing domain classification methods rather than any novel advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium,

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	which may be read and executed by one or more processors.” (’536 patent at 11:63-12:3). This passage further confirms that the claimed system merely executes conventional software instructions on standard computing components rather than improving how domain-specific interpretations are generated. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any domain-based interpretation performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how domain agents generate interpretations differently based on domain-specific information, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of determining interpretations based on different domains is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for processing domain-specific interpretations, further confirming that they are directed to the abstract idea of natural language interpretation using standard computing components.
[5A] The method of claim 1, further comprising:	

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[5B] associating, by the one or more physical processors, the first interpretation with a first interpretation score; and	The concept of associating an interpretation with a score was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent mentions scoring interpretations but does not disclose how scores are calculated, weighted, or applied: “For example, conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest scoring interpretation).” ('536 patent at 4:50-55). While this passage refers to scoring, it does not specify what factors contribute to the score, what algorithm is used, or how different interpretations are compared. The lack of detail suggests that this is a conventional function relying on known scoring techniques rather than any novel advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3).

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	This passage further confirms that the claimed system merely executes conventional software instructions on standard computing components rather than improving how interpretation scores are assigned. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any interpretation scoring performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how interpretation scores are generated or applied, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of associating an interpretation with a score is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for scoring interpretations, further confirming that they are directed to the abstract idea of ranking possible interpretations using standard computing components.
[5C] associating, by the one or more physical processors, the second interpretation with a second interpretation score,	The concept of associating an interpretation with a score was well understood, routine, and conventional in the relevant industry at the relevant time.

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	The '536 patent references scoring interpretations but provides no detail on how scores are generated, weighted, or applied: “For example, conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest scoring interpretation).” ('536 patent at 4:50-55). While this passage mentions scoring interpretations, it does not disclose what factors contribute to the score, what algorithm is used, or how scores are computed and compared. The omission of these details suggests that this is a conventional function that relies on known ranking and selection techniques rather than any novel technological advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3). This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions rather than providing any innovation in interpretation scoring.

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	Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any interpretation scoring performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how interpretation scores are generated or applied, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of associating an interpretation with a score is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for scoring interpretations, further confirming that they are directed to the abstract idea of ranking possible interpretations using standard computing components.
[5D] wherein determining the interpretation comprises determining the first interpretation as the interpretation based on the first interpretation score and the second interpretation score.	The concept of selecting an interpretation based on assigned scores was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent references scoring interpretations but provides no detail on how scores are generated, weighted, or applied: “For example, conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based

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	interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest scoring interpretation).” ('536 patent at 4:50-55). While this passage mentions selecting the highest-scoring interpretation, it fails to disclose any specific method, algorithm, or criteria used for ranking interpretations. The omission of technical detail suggests that this is a conventional function using known ranking and selection techniques rather than any novel advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3). This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions rather than providing any innovation in interpretation scoring. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any ranking or selection process performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not.

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	(Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how interpretation scores are generated, compared, or used to make selections, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of determining an interpretation based on assigned scores is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for ranking and selecting interpretations, further confirming that they are directed to the abstract idea of selecting the most relevant response using conventional computing techniques.
[6] The method of claim 5, wherein the first interpretation is determined as the interpretation based on the first interpretation score being greater than the second interpretation score.	The concept of selecting an interpretation based on a comparison of scores was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent references scoring interpretations but provides no detail on how scores are generated, weighted, or applied: “For example, conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest scoring interpretation).” ('536 patent at 4:50-55). While this passage mentions selecting the highest-scoring interpretation, it does not disclose any criteria, methodology, or algorithm for how the scores are assigned, ranked, or used to determine an interpretation. The lack of technical

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	detail suggests that this is a conventional function using standard ranking techniques rather than any novel advancement. Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3). This passage further confirms that the claimed system simply executes conventional software instructions on standard computing components rather than providing any new method for determining interpretations using scores. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any ranking or selection process performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how scores are actually

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	determined or weighted, the claimed step does not add anything beyond what was already conventional. Thus, the claimed method of selecting an interpretation based on one score being greater than another is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for ranking and selecting interpretations, further confirming that they are directed to the abstract idea of selecting the most relevant response using conventional computing techniques.
[7A] The method of claim 1, further comprising:	
[7B] receiving, at the one or more physical processors, a third natural language utterance relating to one or more of the first natural language utterance or the second natural language utterance; and	The concept of receiving multiple related natural language utterances during a conversation was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that user input, including voice-based utterances, may be received using conventional input devices, without any novel implementation: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone). In various implementations, input device 105 may include a multi-modal input, such as a touch-screen interface, keypad, or other input.” ('536 patent at 3:52-59). This passage makes clear that the receipt of multiple utterances during a conversation is a basic function of natural language processing systems and does not involve any specialized computing techniques.

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	Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3). This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. Furthermore, handling multiple utterances within a conversation was a well-known feature of conversational systems, as confirmed by the trial testimony that a conversational language processor was already known: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the receipt of multiple utterances within a session is an inherent function of such systems, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of receiving a third natural language utterance related to prior utterances is well understood, routine, and conventional. The claims fail

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	to disclose any specific technological improvement for handling conversational input, reinforcing that they are directed to the abstract idea of natural language processing using standard computing components.
[7C] determining, by the one or more physical processors, an interpretation of the third natural language utterance based on the promotional content.	The concept of determining an interpretation of a natural language utterance based on external content, such as promotional content, was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent broadly describes processing natural language utterances but does not provide any technical details on how promotional content is used to influence interpretation: “For example, conversational language processor 120 may use context determination module 130 to establish a context for a current utterance by having domain agents 135 competitively generate a context-based interpretation of the utterance (e.g., by scoring possible interpretations and selecting a highest-scoring interpretation).” (’536 patent at 4:50-55). While this passage discusses scoring and selecting interpretations, it does not explain how promotional content is factored into the interpretation process, what weighting is applied, or whether the promotional content alters the natural language processing function itself. The lack of any technical disclosure suggests that this is a conventional process that simply incorporates external content without any novel processing technique. Additionally, the '536 patent confirms that advertisements may be selected in any number of conventional ways, without specifying how they are used to alter language interpretation:

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	“It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” (’536 patent at 10:37-39). This passage confirms that advertisement selection is broadly defined, lacks any specific technical method, and does not meaningfully describe how promotional content interacts with natural language interpretation. Furthermore, the ’536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” (’536 patent at 11:63-12:3). This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions. Moreover, the trial testimony confirms that a conversational language processor was already known, meaning that any interpretation performed within that system, whether based on promotional content or otherwise, is inherently conventional: Q. Did you invent a conversational language processor? A. I did not.

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	(Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the specification provides no meaningful details on how promotional content is integrated into interpretation beyond general references to contextual processing, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of determining an interpretation of an utterance based on promotional content is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement in how promotional content influences language interpretation, further confirming that they are directed to the abstract idea of natural language processing using conventional computing components.
[8] The method of claim 7, wherein the first natural language utterance, the second natural language utterance, and the third natural language utterance are received during an interactive session between the user and the computer system.	The concept of receiving multiple natural language utterances during an interactive session between a user and a computer system was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that user input, including voice-based utterances, may be received using conventional input devices, without any novel implementation: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone). In various implementations, input device 105 may include a multi-modal input, such as a touch-screen interface, keypad, or other input.” ('536 patent at 3:52-59).

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	This passage establishes that receiving multiple utterances within a conversation is a fundamental aspect of natural language processing and does not involve any specialized computing techniques. Additionally, the '536 patent is silent as to what constitutes an "interactive session," providing no definition or explanation of how it differs from any conventional multi-turn interaction with a system. The lack of detail suggests that the term is used in a generic, conventional sense, rather than describing any specific technological advancement. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that any session-based processing performed within that system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the conversational language processor itself was known, and the receipt of multiple utterances within a session is an inherent function of such systems, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of receiving multiple utterances during an interactive session is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement for handling interactive sessions, reinforcing that they are directed to the abstract idea of natural language processing using standard computing components.

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[9] The method of claim 8, wherein the third natural language utterance is received after the second natural language utterance.	The concept of receiving multiple natural language utterances sequentially in a conversation was well understood, routine, and conventional in the relevant industry at the relevant time. The '536 patent confirms that user input, including voice-based utterances, may be received using conventional input devices, without any novel implementation: “System 100 may receive a user input, including at least a voice-based user utterance, at an input device 105. Input device 105 may include any suitable device, or combination of devices, for receiving a voice-based input (e.g., a microphone). In various implementations, input device 105 may include a multi-modal input, such as a touch-screen interface, keypad, or other input.” ('536 patent at 3:52-59). This passage makes clear that receiving utterances in sequence is an inherent aspect of conversational systems and does not involve any technological improvement. Furthermore, the trial testimony confirms that a conversational language processor was already known, meaning that processing sequential utterances within a system is inherently conventional: Q. Did you invent a conversational language processor? A. I did not. (Trial Tr. 284:2-8, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)).

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	Since the conversational language processor itself was known, and the receipt of multiple utterances over time is an inherent function of such systems, the claimed step adds nothing beyond what was already conventional. Thus, the claimed method of receiving a third utterance after a second utterance is well understood, routine, and conventional. The claims fail to disclose any specific technological improvement, reinforcing that they are directed to the abstract idea of natural language processing using standard computing components.
[10A] The method of claim 7, further comprising:	
[10B] performing, by the one or more physical processors, speech recognition to recognize one or more words of the third natural language utterance, wherein the one or more recognized words of the third natural language utterance include one or more reference words;	The concept of performing speech recognition to recognize words in a natural language utterance was well understood, routine, and conventional in the relevant industry at the relevant time. As has been discussed at length, automatic speech recognition (ASR) was already a commodity technology, as confirmed by trial testimony: Q. And that software section, let's go to the next page, 0194. And if we could on that page, if you could put just the top paragraph on the screen. And kind of put it to the side so you can see both at the same time. During the opening by Amazon's counsel, you indicated that the original Cybermind used some software from IBM, did you hear that? A. Yes. Q. What was that, sir? A. That was a component called the ASR, Automated Speech Recognition engine, and that was pretty much a commodity product at the same time.

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	(Trial Tr. 147:18-148:3, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). This testimony confirms that ASR systems were widely available and did not involve any novel implementation at the time of filing. The claimed method merely applies existing ASR technology to recognize words in a third utterance, a function ASR engines were already designed to perform. Furthermore, the '536 patent provides no definition or explanation of what constitutes a "reference word", nor does it describe how reference words are identified, categorized, or used in the speech recognition process. The absence of any explanation suggests that this term lacks written description support and introduces ambiguity into the claim scope, potentially rendering it indefinite under 35 U.S.C. § 112(b). Additionally, the '536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” ('536 patent at 11:63-12:3). This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions

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	rather than providing any innovation in speech recognition or reference word identification. Thus, the claimed method of performing speech recognition to recognize words in a third natural language utterance, including reference words, is well understood, routine, and conventional. The lack of any definition for "reference words" further suggests that the claims are vague and potentially indefinite, reinforcing that they fail to provide any specific technological improvement over known speech recognition systems.
[10C] determining, by the one or more physical processors, that the one or more reference words refer to an item associated with the promotional content; and	The concept of determining that a word in a natural language utterance refers to an item associated with promotional content was well understood, routine, and conventional in the relevant industry at the relevant time. As previously noted, the '536 patent is silent on what constitutes a "reference word," providing no definition, criteria, or explanation of how such words are identified or distinguished from other words in an utterance. The lack of clarity suggests that this step relies on conventional word-matching or keyword-based techniques, rather than any novel linguistic processing method. Additionally, the '536 patent describes selecting advertisements based on user input in broad, functional terms, without any specific implementation for linking words to promotional content: “It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” ('536 patent at 10:37-39).

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	“Other techniques and features of selecting and presenting advertisements based on voice-based inputs may suitably be employed, as would be apparent.” (’536 patent at 7:24-26). These passages confirm that the specification provides no technical explanation of how reference words are identified or how they are linked to promotional content, further reinforcing that the claims are purely functional and abstract. Furthermore, as the Federal Circuit has repeatedly held, functional claims that do not describe how targeted advertising is performed are simply directed to the abstract idea of targeted advertising: “Targeted marketing is a form of ‘tailoring information based on [provided] data,’ which we have previously held is an abstract idea.” (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015)). “Selecting advertisements based on context is a form of targeted marketing.” (<i>Bridge & Post, Inc. v. Verizon Commc’ns, Inc.</i>, 778 F. App’x 882, 887 (Fed. Cir. 2019)). Additionally, the ’536 patent confirms that the claimed method runs entirely on generic computing hardware and software, without any technological improvement: “Implementations of the invention may be made in hardware, firmware, software, or any combination thereof. The invention may also be implemented as instructions stored on a machine-readable medium, which may be read and executed by one or more processors.” (’536 patent at 11:63-12:3).

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	This passage further confirms that the so-called "physical processor" referenced in the claims is entirely generic, performing only standard computing functions rather than providing any innovation in linking reference words to promotional content. Thus, the claimed method of determining that one or more reference words refer to an item associated with promotional content is well understood, routine, and conventional. The failure to define "reference words" and the lack of any disclosed method for associating words with advertisements further confirm that the claims recite only the abstract idea of linking keywords to advertisements using standard computing components, without any technological improvement.
[10D] initiating, by the one or more physical processors, a purchase transaction associated with the item based on the determination that the one or more reference words refer to the item.	The concept of initiating a purchase transaction based on recognized words in a natural language utterance was well understood, routine, and conventional. The '536 patent is silent on "purchase transactions," providing no details on how they are identified, processed, or executed. This suggests the claim merely assumes the existence of a conventional e-commerce system without any novel implementation. Additionally, the patent broadly states that advertisements may be selected using various conventional methods but does not link this process to initiating transactions in any specific way: “It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” ('536 patent at 10:37-39). Further, the Federal Circuit has consistently held that functional claims lacking details on how targeted advertising or transactions are performed are abstract:

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	“Targeted marketing is a form of ‘tailoring information based on [provided] data,’ which we have previously held is an abstract idea.” (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i>, 792 F.3d 1363, 1369 (Fed. Cir. 2015)). Thus, the claimed method of initiating a purchase transaction is well understood, routine, and conventional. The lack of any technical details on executing transactions confirms that the claims recite only an abstract idea applied to standard computing components.
[11] The method of claim 10, wherein the item includes a purchasable good.	The concept of identifying a purchasable good in response to user input is well understood, routine, and conventional. The '536 patent is silent on how a purchasable good is identified or distinguished from other items, suggesting that this step contains nothing inventive.
[12A] The method of claim 7, further comprising:	
[12B] initiating, by the one or more physical processors, based on the interpretation of the third natural language utterance, a purchase transaction associated with the promotional content.	The '536 patent does not describe how purchase transactions are initiated, instead assuming the use of standard transaction-processing systems. The Federal Circuit has found that claims reciting targeted advertising and online transactions, without explaining how they are technically achieved, are abstract (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i> , 792 F.3d 1363, 1369 (Fed. Cir. 2015)).
[13A] The method of claim 1, wherein the first natural language utterance and the second natural language utterance are received during an interactive session between the user and the computer system, the method further comprising:	The '536 patent does not define what constitutes an "interactive session," providing no details on how it differs from any conventional conversational interaction. The lack of a technical definition reinforces that this is simply a conventional multi-turn conversation model, rather than any novel computing technique. Without an explanation of how the session is structured, managed, or

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	improved, this step adds nothing beyond what was already conventional in natural language processing.
[13B] receiving, at the one or more physical processors, a third natural language utterance during the interactive session; and	The receipt of multiple utterances during an interaction is an inherent feature of natural language processing systems, lacking any novel implementation. The '536 patent does not provide any new approach for handling multi-turn conversations, instead assuming the use of conventional processing techniques already used in conversational systems. Since the claim relies on a generic physical processor, it fails to introduce any technological improvement beyond routine processing functions.
[13C] processing, by the one or more physical processors, based on the third natural language utterance, the one or more recognized words to determine a reinterpretation of the second natural language utterance.	The concept of processing a recognized utterance to determine a reinterpretation of a prior utterance was well understood, routine, and conventional at the relevant time. The '536 patent states that reinterpretation is performed by an adaptive misrecognition engine but does not describe any novel implementation of this process: “Furthermore, conversational language processor 120 may support adaptive misrecognition to reinterpret a current utterance and/or one or more previous utterances. For example, information contained in a current utterance may indicate that interpretations for one or more previous utterances were incorrect, and therefore, the previous utterances may be reinterpreted to improve subsequent interpretations.” ('536 patent at 5:4-10). This passage identifies the function of reinterpretation but fails to disclose any specific algorithm, criteria, or method for determining misrecognition or

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	performing reinterpretation, reinforcing that this is a conventional function of conversational systems rather than a novel advancement. Furthermore, trial testimony confirms that adaptive misrecognition engines were already conventional, meaning that this aspect of the claimed invention does not provide a technological improvement: Q. And if you look at, towards the bottom of the blowout, it says an adaptive misrecognition engine. Do you see that? A. Yes, I do. Q. Did you invent an adaptive misrecognition engine? A. I'm not aware of other representations. Q. My question is simple, this claim says an adaptive misrecognition engine. Did you invent an adaptive misrecognition engine or not? A. I don't know, there were other implementations, I don't know who was the first to do it, there were others. (Kennewick Testimony, Tr. 227:6-16, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). This testimony confirms that adaptive misrecognition engines already existed at the time of filing, and the inventors could not claim to have invented them. Since the '536 patent relies on an adaptive misrecognition engine for reinterpretation, and such engines were already known, the claimed method does not introduce any new or improved way to handle speech recognition errors. Thus, the claimed method of processing an utterance to determine a reinterpretation is well understood, routine, and conventional. The lack of technical detail in the specification and the admission that adaptive misrecognition engines were already known confirm that this step merely

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	applies a conventional function to standard computing components without any technological improvement.
[14]. The method of claim 13, wherein determining the promotional content comprises determining the promotional content based on the reinterpretation.	The '536 patent does not describe how reinterpretation affects the selection of promotional content, instead generically stating that advertisements may be selected in various ways ('536 patent at 10:37-39). Without any disclosed technical process for linking reinterpretation to advertisement selection, this step simply applies standard targeted marketing techniques without introducing any technological advancement
[15A] The method of claim 13, wherein determining the promotional content comprises determining the promotional content based on the interpretation, the method further comprising:	This limitation builds on prior steps but fails to introduce any new method for selecting promotional content, instead relying on interpretations that are themselves derived using conventional techniques.
[15B] determining, by the one or more physical processors, other promotional content based on the reinterpretation; and	The concept of determining promotional content based on reinterpretation was well understood, routine, and conventional. The '536 patent does not disclose how reinterpretation influences ad selection, instead broadly stating that advertisements may be selected using various unspecified techniques: “It will be apparent that operation 320 may use various techniques to select advertisements based on voice-based inputs and/or requests included therein.” ('536 patent at 10:37-39). Additionally, reinterpretation is performed by the adaptive misrecognition engine, which was admitted to be conventional: Q. Did you invent an adaptive misrecognition engine?

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	A. I don't know, there were other implementations, I don't know who was the first to do it, there were others. (Kennewick Testimony, Tr. 227:6-16, VB Assets v. Amazon.com Services LLC, No. 19-cv-01410, at ECF No. 304 (D. Del. Dec. 12, 2023)). Since the claim relies on conventional adaptive misrecognition to reinterpret an utterance and applies standard ad-selection techniques, this limitation adds nothing beyond known targeted marketing practices.
[15C] presenting, by the one or more physical processors, the other promotional content to the user.	The presentation of advertisements is a well-known function of digital marketing systems, and the '536 patent merely states that promotional content may be presented in any conventional way ('536 patent at 7:24-26). The Federal Circuit has held that claims directed to targeted marketing without technical innovation are abstract (<i>Bridge & Post, Inc. v. Verizon Commc'ns, Inc.</i>, 778 F. App'x 882, 887 (Fed. Cir. 2019)). Since the claim relies on a standard physical processor, without specifying any novel processing or presentation method, it fails to introduce any technological improvement.
[16A] The method of claim 1, further comprising:	
[16B] identifying, by the one or more physical processors, one or more requests associated with the second natural language utterance,	The '536 patent provides no explanation of how requests are identified, instead stating generically that a "content/action identification module" may identify content, actions, or topics related to the input:

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	“For example, content/action identification module 235 may identify content of the voice-based input (e.g., words in the input), requested information (e.g., search results, a web page, music, video, graphics, or other information), requested actions (e.g., calculating a navigation route, placing a telephone call, playing a song, etc.), a category or topic related to the input (e.g., music, business, stocks, sports, navigation, movies, etc.), or other criteria to use in selecting an advertisement.” (’536 patent at 6:15-22). This passage describes only the intended function of request identification without any disclosed algorithm, logic, or process, reinforcing that this step is purely functional and lacks any novel implementation.
[16C] wherein determining the promotional content comprises obtaining the promotional content based on a determination that the promotional content relates to the one or more requests.	The '536 patent does not disclose any method for determining how promotional content "relates" to a request, instead broadly stating that various factors "may be used in selecting an advertisement" (’536 patent at 10:37-39). Without any specific selection criteria or process, this limitation merely applies conventional targeted advertising techniques without a technological improvement.
[17A] The method of claim 16, further comprising:	
[17B] determining, by the one or more physical processors, one or more activities in the one or more requests; and	The '536 patent is silent on how "activities" are determined, reinforcing that this step relies on standard processing techniques without disclosing any novel implementation. The specification only states that activities may include "placing a telephone call" or "playing a song" but does not explain how the system identifies these actions from user input (’536 patent at 6:15-22).

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[17C] performing, by the one or more physical processors, the one or more activities,	Executing an activity based on a request is an inherent function of conversational systems, and the '536 patent does not disclose any specific method for performing activities differently from conventional approaches. Since the claim relies on a generic physical processor, it fails to introduce any novel processing method or technical improvement beyond well-known execution processes.
[17D] wherein determining the promotional content comprises determining the promotional content based on the one or more activities.	The '536 patent does not disclose any novel method for linking promotional content selection to activities, instead stating that advertisements may be selected based on various factors ('536 patent at 10:37-39). Without any disclosed algorithm or improvement, this step merely applies known targeted marketing strategies.
[18] The method of claim 17, wherein determining the one or more activities comprises determining a call to be initiated for the user in response to the one or more requests, wherein performing the one or more activities comprises initiating the call for the user, and wherein determining the promotional content comprises determining the promotional content based on the call.	The '536 patent does not disclose how calls are determined or initiated, instead broadly describing that requested actions may include "placing a telephone call" ('536 patent at 6:15-22). The specification provides no details on how promotional content is selected based on a call, confirming that this step applies conventional call initiation and ad-targeting techniques without any novel implementation.
[19] The method of claim 17, wherein determining the one or more activities comprises determining a navigation route to be calculated for the user in response to the one or more requests, wherein performing the one or more activities comprises calculating the navigation route for the user, and wherein determining the promotional content comprises determining the	The '536 patent merely states that requested actions may include "calculating a navigation route" but does not disclose how the system determines which route to select or how it affects promotional content ('536 patent at 6:15-22). The lack of any novel method for integrating navigation data with promotional content confirms that this limitation simply applies conventional mapping and ad-targeting practices.

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promotional content based on the navigation route.	
[20] The method of claim 17, wherein determining the one or more activities comprise determining a media item to be presented in response to the one or more requests, wherein performing the one or more activities comprises presenting the media item to the user, and wherein determining the promotional content comprises determining the promotional content based on the media item, the promotional content being different than the media item.	The '536 patent does not explain how media items are determined or how promotional content is influenced by them, instead broadly stating that actions may include "playing a song" or presenting other media ('536 patent at 6:15-22). Since no technical method is disclosed for linking media presentation with ad selection, this limitation merely applies conventional content recommendations and advertising techniques.
[21] The method of claim 17, wherein determining the one or more activities comprises determining a reservation to be made on behalf of the user in response to the one or more requests, and wherein determining the promotional content comprises determining the promotional content based on information relating to the reservation.	The '536 patent is silent on how reservations are determined, processed, or linked to promotional content, reinforcing that this step relies on conventional booking systems and targeted advertising techniques. Without any disclosed improvement in how reservations are handled, this limitation merely applies routine reservation processing and marketing practices.
[22] The method of claim 17, wherein determining the one or more activities comprises determining a first reservation to be made on behalf of the user in response to the one or more requests, and wherein determining the promotional content comprises determining the	The '536 patent does not disclose how alternative reservations are determined or how they influence promotional content selection, instead assuming the use of conventional booking and ad-targeting methods. Since the specification lacks any details on how an alternative reservation is selected, ranked, or processed, this limitation adds nothing beyond known e-commerce and marketing techniques.

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promotional content based on information relating to a second reservation that is an alternative to the first reservation.	
[23A] The method of claim 17, further comprising:	
[23B] receiving, at the one or more physical processors, a third natural language utterance relating to one or more of the first natural language utterance or the second natural language utterance;	Receiving multiple utterances in a conversation is an inherent feature of natural language processing systems, and the '536 patent provides no unconventional method for handling sequential utterances beyond conventional conversation-tracking techniques ('536 patent at 3:52-59). Since this claim relies on a generic physical processor, it fails to introduce any specialized computing improvement.
[23C] determining, by the one or more physical processors, an interpretation of the third natural language utterance based on the promotional content; and	The '536 patent does not describe how promotional content is factored into language interpretation, instead broadly stating that advertisements may be selected based on unspecified techniques ('536 patent at 10:37-39). Without any disclosed method for linking promotional content to interpretation, this limitation relies on conventional natural language processing and targeted advertising techniques.
[23D] initiating, by the one or more physical processors, based on the interpretation of the third natural language utterance, a purchase transaction associated with the promotional content.	The '536 patent is silent on how purchase transactions are initiated or processed, assuming the existence of conventional e-commerce systems. The Federal Circuit has found that functional claims that merely recite targeted advertising and purchase transactions without technical details are abstract (<i>Intellectual Ventures I LLC v. Capital One Bank (USA)</i> , 792 F.3d 1363, 1369 (Fed. Cir. 2015)). Since this step relies on a standard physical processor and lacks implementation details, it adds nothing beyond known e-commerce practices.
[24A] The method of claim 16, further comprising:	

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[24B] determining, by the one or more physical processors, that at least one request of the one or more requests is incomplete or ambiguous;	The '536 patent does not disclose any specific method for detecting ambiguous or incomplete requests, instead broadly stating that the system “may use various techniques” and referencing prior patents without further explanation: “The conversational language processor may therefore use various techniques to identify a conversation type, interpret utterances, identify requests, or perform other tasks, such as those described in the aforementioned U.S. Patent Applications and U.S. Patents.” ('536 patent at 8:9-19). By merely referring to unspecified prior work without explaining how ambiguity is detected, this limitation fails to disclose any technological advancement and instead relies on conventional request-handling techniques.
[24C] monitoring, by the one or more physical processors, interaction of the user with the promotional content; and	Tracking user interaction with advertisements is a standard practice in digital marketing, and the '536 patent does not disclose any novel method for monitoring engagement. Instead, it provides only a broad functional description of advertisement selection and user interaction tracking ('536 patent at 10:46-56). Without details on how monitoring occurs, what data is collected, or how interactions influence future processing, this step relies entirely on conventional tracking mechanisms rather than any technological improvement. In addition, the subject of this limitation is described as conventional and routine in Plummer (2007).
[24D] interpreting, by the one or more physical processors, the at least one incomplete or ambiguous request based on the interaction.	The '536 patent does not explain how user interaction with promotional content informs the interpretation of incomplete requests, instead broadly stating that various factors may be used in advertisement selection ('536 patent at 10:37-39). Without any disclosed algorithm or technical process linking user engagement to

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	ambiguity resolution, this step merely applies known methods of refining interpretations based on user behavior.
[25] The method of claim 16, wherein the one or more requests include a first request associated with a first application and a second request associated with a second application different than the first application, and wherein the promotional content relates to one or more of the first request or the second request.	The '536 patent does not disclose any method for associating multiple application requests with promotional content, instead assuming standard request-handling techniques. Since the claim does not specify how requests are categorized, prioritized, or linked to advertisements, it merely applies conventional targeted advertising practices to multiple applications without any disclosed innovation.
[26] The method of claim 25, wherein a first application type of the first application includes one or more of a navigation application, a music application, a commerce application, or a calling application, and wherein the second application is of an application type different than the first application type.	Categorizing applications based on type is a fundamental aspect of computing and does not involve any novel implementation. The '536 patent does not provide any technical method for distinguishing applications beyond generic classification, confirming that this step merely applies standard software categorization techniques without any advancement.
[27] The method of claim 16, wherein the one or more requests include a first request to be processed by a first device associated with the user and a second request to be processed by a second device associated with the user, and wherein the promotional content relates to one or more of the first request or the second request.	Handling requests across multiple devices is a routine function of networked computing systems, and the '536 patent does not disclose any specific method for distributing requests between devices. Since the specification fails to describe how device association is determined, how requests are assigned, or how promotional content is selected based on multiple devices, this limitation merely applies conventional multi-device request handling and targeted marketing techniques.

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[28] The method of claim 27, wherein a first device type of the first device includes one or more of a mobile phone, a navigation device, or a media player device, and wherein the second device is of a device type different than the first device type.	Classifying devices by type is a fundamental aspect of computing and does not constitute a novel implementation. The '536 patent does not provide any method for distinguishing devices beyond broad classification, confirming that this step relies on routine device categorization without technical innovation.
[29] The method of claim 27, wherein the first device and the second device are operably independent of one another.	Device independence is an inherent feature of many modern computing environments and does not involve any specific technical advancement. The '536 patent does not disclose any method for managing independent devices or coordinating tasks between them, reinforcing that this limitation merely describes a conventional multi-device interaction model without innovation.
[30A] The method of claim 1, further comprising:	
[30B] obtaining, by the one or more physical processors, user profile information associated with the user, wherein the user profile information specifies prior user interactions with items; and	The concept of obtaining user profile information and tracking prior interactions is a well-known practice in targeted advertising and recommendation systems. The '536 patent provides no novel method for collecting, storing, or retrieving user profile data, instead broadly stating that user profiles “may identify characteristics of a specific user” and include “personal preferences, location-based information, and other criteria” ('536 patent at 6:22-28). Since no technical details are provided on how the system processes user interactions, this step merely applies conventional data tracking methods without any technological advancement. In addition, the subject of this limitation is described as conventional and routine in Plummer (2007).

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[30C] identifying, by the one or more physical processors, categories of items based on the prior user interactions specified by the user profile information,	Categorizing items based on prior user interactions is a standard feature of recommendation systems. The '536 patent does not describe any specific method or algorithm for determining item categories, instead relying on broad functional descriptions of associating user activity with relevant content ('536 patent at 6:15-22). Without any disclosed improvement in how categories are identified, this limitation merely applies well-known classification techniques without introducing any novel computing method. In addition, the subject of this limitation is described as conventional and routine in Plummer (2007).
[30D] wherein determining the promotional content comprises determining a promotional item associated with one of the categories.	Selecting promotional content based on categorized user interactions is a fundamental practice in targeted marketing. The '536 patent does not disclose any specific ranking, weighting, or selection method for determining which promotional item is associated with a given category, instead stating that advertisement selection “may use various techniques” ('536 patent at 10:37-39). Since no specific method is provided for associating promotional content with categories, this limitation merely applies conventional targeted advertising techniques. In addition, the subject of this limitation is described as conventional and routine in Plummer (2007).
[31pre] The method of claim 1, further comprising:	
[31A] obtaining, by the one or more physical processors, user profile information associated	Tracking user interactions and storing profile data is a well-known and conventional practice in targeted advertising and recommendation systems. The '536 patent does not disclose any novel method for collecting, storing, or

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with the user, wherein the user profile information specifies prior user interactions with items;	retrieving user profile data, instead stating that user profiles "may identify characteristics of a specific user" such as preferences, location-based information, or other criteria ('536 patent at 6:22-28). Since no technical details are provided on how user interactions are processed or stored, this step merely applies conventional user profiling techniques without introducing any new technological improvement. In addition, the subject of this limitation is described as conventional and routine in Plummer (2007).
[31B] identifying, by the one or more physical processors, one or more requests associated with the first natural language utterance or the second natural language utterance;	The '536 patent does not define how requests are identified or distinguished from general utterances, instead stating that a "content/action identification module" may identify requested actions ('536 patent at 6:15-22). The lack of any specific algorithm or process for request identification confirms that this step is purely functional and relies on conventional methods of processing user queries.
[31C] determining, by the one or more physical processors, one or more applications for processing the one or more requests; and	Determining which application should process a request is a routine function of modern computing systems, and the '536 patent does not provide any specific method for making this determination. The specification broadly states that requested actions "may include calculating a navigation route, placing a call, or playing a song" ('536 patent at 6:15-22), but it does not explain how the system selects an appropriate application, reinforcing that this is a conventional function.
[31D] identifying, by the one or more physical processors, categories of items based on the prior user interactions specified by the user profile information, wherein the categories relate to the one or more applications,	Categorizing items based on prior user interactions is a standard practice in recommendation systems. The '536 patent does not describe how categories are determined or how they are linked to applications, instead stating generically that user profiles may be used for selecting relevant content ('536 patent at 6:15-22). Without a disclosed method for linking categories to applications, this step merely applies conventional classification techniques.

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[31E] wherein determining the promotional content comprises determining a promotional item associated with one of the categories.	Selecting promotional content based on categorized user interactions is a fundamental practice in targeted marketing. The '536 patent does not disclose any ranking, weighting, or selection method for determining which promotional item is associated with a given category, instead stating that advertisement selection “may use various techniques” ('536 patent at 10:37-39). Since no specific method is provided for associating promotional content with categories, this limitation merely applies conventional targeted advertising techniques without any technical improvement.
[32P] A system for providing promotional content related to one or more natural language utterances and/or responses, the system comprising: program instructions which, when executed, cause the one or more physical processors to:	Claim 32P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[32A] one or more physical processors programmed to execute one or more computer	The use of generic physical processors to perform otherwise ineligible subject matter has long been held to not save a claim from ineligibility.
[32B] receive a first natural language utterance;	Claim 32B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[32C] provide a response to the first natural language utterance;	Claim 32C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[32D] receive a second natural language utterance relating to the first natural language utterance;	Claim 32D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].

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[32E] perform speech recognition to recognize one or more words of the second natural language utterance;	Claim 32E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1D].
[32F] determine domain information for the one or more recognized words based on the first natural language utterance;	Claim 32F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1E].
[32G] process, based on the domain information, the one or more recognized words to determine an interpretation of the second natural language utterance, wherein processing the one or more recognized words comprises:	Claim 32G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1F].
[32H] providing the one or more recognized words to a first domain agent associated with a first domain and a second domain agent associated with a second domain;	Claim 32H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1G].
[32I] obtaining a first interpretation of the second natural language utterance from the first domain agent;	Claim 32I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1H].
[32J] obtaining a second interpretation of the second natural language utterance from the second domain agent; and	Claim 32J is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1I].

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[32K] determining the interpretation based on one or more of the first interpretation or the second interpretation;	Claim 32K is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1J].
[32L] determine promotional content based on the interpretation; and	Claim 32L is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1K].
[32M] present the promotional content to a user.	Claim 32M is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[33P] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising:	Claim 33P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[33A] receiving, at the one or more physical processors, a first natural language utterance during an interactive session between a user and the computer system;	Claim 33A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[33B] providing, by the one or more physical processors, a response to the first natural language utterance;	Claim 33B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].

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[33C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance during the interactive session;	Claim 33C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C], [13A], and [8].
[33D] performing, by the one or more physical processors, speech recognition to recognize one or more words of the second natural language utterance;	Claim 33D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1D].
[33E] processing, by the one or more physical processors, based on the first natural language utterance, the one or more recognized words to determine an interpretation of the second natural language utterance;	Claim 33E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1].
[33F] receiving, at the one or more physical processors, a third natural language utterance during the interactive session;	Claim 33F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [13B] and [8].
[33G] processing, by the one or more physical processors, based on the third natural language utterance, the one or more recognized words to determine a reinterpretation of the second natural language utterance;	Claim 33G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [13C].
[33H] determining, by the one or more physical processors, promotional content based on one or	Claim 33H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1K] and [14].

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more of the interpretation or the reinterpretation; and	
[33I] presenting, by the one or more physical processors, the promotional content to the user.	Claim 33I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[34] The method of claim 33, wherein determining the promotional content comprises determining the promotional content based on the reinterpretation.	Claim 34 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [14].
[35A] The method of claim 33, wherein determining the promotional content comprises determining the promotional content based on the interpretation, the method further comprising:	Claim 35A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [15A].
[35B] determining, by the one or more physical processors, other promotional content based on the reinterpretation; and	Claim 35B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [15B].
[35C] presenting, by the one or more physical processors, the other promotional content to the user.	Claim 35C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [15C].
[36P] A system for providing promotional content related to one or more natural language utterances and/or responses, the system comprising:	Claim 36P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].

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[36A] one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to:	Claim 36A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [32A].
[36B] receive a first natural language utterance during an interactive session between a user and the system;	Claim 36B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [33A].
[36C] provide a response to the first natural language utterance;	Claim 36C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[36D] receive a second natural language utterance relating to the first natural language utterance during the interactive session;	Claim 36D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [1C], [13A], [8].
[36E] perform speech recognition to recognize one or more words of the second natural language utterance;	Claim 36E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1D].
[36F] process, based on the first natural language utterance, the one or more recognized words to determine an interpretation of the second natural language utterance;	Claim 36F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [33E].
[36G] receive a third natural language utterance during the interactive session;	Claim 36G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [13B] and [8].

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[36H] process, based on the third natural language utterance, the one or more recognized words to determine a reinterpretation of the second natural language utterance;	Claim 36H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [13C].
[36I] determine promotional content based on one or more of the interpretation or the reinterpretation; and	Claim 36I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [1K] and [14].
[36J] present the promotional content to the user.	Claim 37J is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[37P] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising:	Claim 37P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[37A] receiving, at the one or more physical processors, a first natural language utterance;	Claim 37A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[37B] providing, by the one or more physical processors, a response to the first natural language utterance;	Claim 37B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].

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[37C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance;	Claim 73C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[37D] identifying, by the one or more physical processors, one or more requests associated with the second natural language utterance;	Claim 37D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [16A].
[37E] determining, by the one or more physical processors, that at least one request of the one or more requests is incomplete or ambiguous;	Claim 37E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [24A].
[37F] determining, by the one or more physical processors, promotional content that relates to the one or more requests;	Claim 37F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16B], 25[B], and 27[B].
[37G] presenting, by the one or more physical processors, the promotional content to a user;	Claim 37G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[37H] monitoring, by the one or more physical processors, interaction of the user with the promotional content; and	Claim 37H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [24B].
[37I] interpreting, by the one or more physical processors, the at least one incomplete or ambiguous request based on the interaction.	Claim 37I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [24C].
[38P] A system for providing promotional content related to one or more natural language	Claim 38P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].

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utterances and/or responses, the system comprising:	
[38A] one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to:	Claim 38A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [32A].
[38B] receive a first natural language utterance;	Claim 38B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[38C] provide a response to the first natural language utterance;	Claim 38C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[38D] receive a second natural language utterance relating to the first natural language utterance;	Claim 38D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[38E] identify one or more requests associated with the second natural language utterance;	Claim 38E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [16A].
[38F] determine that at least one request of the one or more requests is incomplete or ambiguous;	Claim 38F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [24A].
[38G] determine promotional content that relates to the one or more requests;	Claim 38G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16B], 25[B], and 27[B].
[38H] present the promotional content to a user;	Claim 38H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].

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[38I] monitor interaction of the user with the promotional content; and	Claim 38I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [24B].
[38J] interpret the at least one incomplete or ambiguous request based on the interaction.	Claim 38J is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [24C].
[39P] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising:	Claim 39P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[39A] receiving, at the one or more physical processors, a first natural language utterance;	Claim 39A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[39B] providing, by the one or more physical processors, a response to the first natural language utterance;	Claim 39B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[39C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance;	Claim 39C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[39D] identifying, by the one or more physical processors, requests associated with the second	Claim 39D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16A] and [25A].

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natural language utterance, wherein the requests include a first request associated with a first application and a second request associated with a second application different than the first application;	
[39E] determining, by the one or more physical processors, promotional content that relates to one or more of the first request or the second request; and	Claim 39E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16B], 25[B], and 27[B].
[39F] presenting, by the one or more physical processors, the promotional content to a user.	Claim 39F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[40] The method of 39 , wherein a first application type of the first application includes one or more of a navigation application, a music application, a commerce application, or a calling application, and wherein the second application is of an application type different than the first application type.	Claim 40 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [26].
[41] The method of claim 39, further comprising: receiving, at the one or more physical processors, a third natural language utterance relating to one or more of the first natural language utterance or the second natural language utterance; and determining, by the one or more physical processors, an interpretation of	Claim 41 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [7A], [7B], [23A], and [23B].

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the third natural language utterance based on the promotional content.	
[42] The method of claim 41, further comprising: initiating, by the one or more physical processors, based on the interpretation of the third natural language utterance, a purchase transaction associated with the promotional content.	Claim 42 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [12] and [23C].
[43P] A system for providing promotional content related to one or more natural language utterances and/or responses, the system comprising:	Claim 43P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[43A] one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to:	Claim 43A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [32A].
[43B] receive a first natural language utterance;	Claim 43B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[43C] provide a response to the first natural language utterance;	Claim 43C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].

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[43D] receive a second natural language utterance relating to the first natural language utterance;	Claim 43D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[43E] identify requests associated with the second natural language utterance, wherein the requests include a first request associated with a first application and a second request associated with a second application different than the first application;	Claim 43E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16A] and [25A].
[43F] determine promotional content that relates to one or more of the first request or the second request; and	Claim 43F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16B], [25B], and [27B].
[43G] present the promotional content to a user.	Claim 43G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[44P] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising:	Claim 44P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].

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[44A] receiving, at the one or more physical processors, a first natural language utterance;	Claim 44A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[44B] providing, by the one or more physical processors, a response to the first natural language utterance;	Claim 44B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[44C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance;	Claim 44C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[44D] identifying, by the one or more physical processors, requests associated with the second natural language utterance, wherein the requests include a first request to be processed by a first device associated with a user and a second request to be processed by a second device associated with the user;	Claim 44D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16A] and [27A].
[44E] determining, by the one or more physical processors, promotional content that relates to one or more of the first request or the second request; and	Claim 44E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16B], 25[B], and 27[B].
[44F] presenting, by the one or more physical processors, the promotional content to the user.	Claim 44F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[45] The method of claim 44, wherein a first device type of the first device includes one or	Claim 45 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [28].

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more of a mobile phone, a navigation device, or a media player device, and wherein the second device is of a device type different than the first device type.	
[46] The method of claim 44, wherein the first device and the second device are operably independent of one another.	Claim 46 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [29].
[47] The method of claim 44, further comprising: receiving, at the one or more physical processors, a third natural language utterance relating to one or more of the first natural language utterance or the second natural language utterance; and determining, by the one or more physical processors, an interpretation of the third natural language utterance based on the promotional content	Claim 47 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements[7A], [7B], [23A], and [23B].
[48] The method of claim 47, further comprising: initiating, by the one or more physical processors, based on the interpretation of the third natural language utterance, a purchase transaction associated with the promotional content.	Claim 48 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements[12] and [23C].
[49P] A system for providing promotional content related to one or more natural language	Claim 49P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].

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utterances and/or responses, the system comprising:	
[49A] one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to:	Claim 49A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [32A].
[49B] receive a first natural language utterance;	Claim 49B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[49C] provide a response to the first natural language utterance;	Claim 49C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[49D] receive a second natural language utterance relating to the first natural language utterance;	Claim 49D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[49E] identify requests associated with the second natural language utterance, wherein the requests include a first request to be processed by a first device associated with a user and a second request to be processed by a second device associated with the user;	Claim 49E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16A] and [27A].
[49F] determine promotional content that relates to one or more of the first request or the second request; and	Claim 49F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [16B], 25[B], and 27[B].

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[49G] present the promotional content to the user.	Claim 49G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[50P] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising:	Claim 50P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[50A] receiving, at the one or more physical processors, a first natural language utterance;	Claim 50A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[50B] providing, by the one or more physical processors, a response to the first natural language utterance;	Claim 50B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[50C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance;	Claim 50C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[50D] obtaining, by the one or more physical processors, user profile information associated with a user, wherein the user profile information specifies prior user interactions with items;	Claim 50D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30A] and [31A].

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[50E] identifying, by the one or more physical processors, categories of items based on the prior user interactions specified by the user profile information;	Claim 50E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30B] and [31D].
[50F] determining, by the one or more physical processors, based on the first natural language utterance and the second natural language utterance, promotional content associated with one of the categories; and	Claim 50F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30C] and 31[F].
[50G] presenting, by the one or more physical processors, the promotional content to the user.	Claim 50G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[51] The method of claim 50, further comprising: receiving, at the one or more physical processors, a third natural language utterance relating to one or more of the first natural language utterance or the second natural language utterance; and determining, by the one or more physical processors, an interpretation of the third natural language utterance based on the promotional content	Claim 51 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [7A], [7B], [23A], and [23B].
[52] The method of claim 51, further comprising: initiating, by the one or more physical processors, based on the interpretation of the	Claim 52 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [12] and [23C].

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Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
third natural language utterance, a purchase transaction associated with the promotional content.	
[53P] A system for providing promotional content related to one or more natural language utterances and/or responses, the system comprising:	Claim 53P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[53A] one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to:	Claim 53A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [32A].
[53B] receive a first natural language utterance;	Claim 53B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[53C] provide a response to the first natural language utterance;	Claim 53C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[53D] receive a second natural language utterance relating to the first natural language utterance;	Claim 53D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[53E] obtain user profile information associated with a user, wherein the user profile information specifies prior user interactions with items;	Claim 53E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30A] and [31A].

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Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
[53F] identify categories of items based on the prior user interactions specified by the user profile information;	Claim 53F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30B] and [31D].
[53G] determine, based on the first natural language utterance and the second natural language utterance, promotional content associated with one of the categories; and	Claim 53G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30C] and 31[F].
[53H] present the promotional content to the user.	Claim 53H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[54P] A computer-implemented method of providing promotional content related to one or more natural language utterances and/or responses, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising:	Claim 54P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[54A] receiving, at the one or more physical processors, a first natural language utterance;	Claim 54A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[54B] providing, by the one or more physical processors, a response to the first natural language utterance;	Claim 54 is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].

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[54C] receiving, at the one or more physical processors, a second natural language utterance relating to the first natural language utterance;	Claim 54C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[54D] obtaining, by the one or more physical processors, user profile information associated with a user, wherein the user profile information specifies prior user interactions with items;	Claim 54D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30A] and [31A].
[54E] identifying, by the one or more physical processors, one or more requests associated with one or more of the first natural language utterance or the second natural language utterance;	Claim 54E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [31B].
[54F] determining, by the one or more physical processors, one or more applications for processing the one or more requests; and	Claim 54F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [31C].
[54G] identifying, by the one or more physical processors, categories of items based on the prior user interactions specified by the user profile information, wherein the categories relate to the one or more applications;	Claim 54G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30B], [31D] and [31E].
[54H] determining, by the one or more physical processors, based on the first natural language utterance and the second natural language	Claim 54H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30C] and 31[F].

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Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
utterance, promotional content associated with one of the categories; and	
[54I] presenting, by the one or more physical processors, the promotional content to the user.	Claim 54I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].
[55P] A system for providing promotional content related to one or more natural language utterances and/or responses, the system comprising:	Claim 55P is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1P].
[55A] one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to:	Claim 55A is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [32A].
[55B] receive a first natural language utterance;	Claim 55B is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1A].
[55C] provide a response to the first natural language utterance;	Claim 55C is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1B].
[55D] receive a second natural language utterance relating to the first natural language utterance;	Claim 55D is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1C].
[55E] obtain user profile information associated with a user, wherein the user profile information specifies prior user interactions with items;	Claim 55E is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30A] and [31A].

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Claim Language	Description of the Industry and Description of How Each Element Was Well-Understood, Routine, and Conventional
[55F] identify one or more requests associated with one or more of the first natural language utterance or the second natural language utterance;	Claim 55F is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [31B].
[55G] determine one or more applications for processing the one or more requests; and	Claim 55G is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [31C].
[55H] identify categories of items based on the prior user interactions specified by the user profile information, wherein the categories relate to the one or more applications;	Claim 55H is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30B], [31D], and [31E].
[55I] determine, based on the first natural language utterance and the second natural language utterance, promotional content associated with one of the categories; and	Claim 55I is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim elements [30C] and 31[F].
[55J] present the promotional content to the user.	Claim 55J is well-understood, routine, and conventional for at least the reasons set forth above. <i>See</i> claim element [1L].

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Pursuant to Judge Gilstrap’s Standing Order Regarding Subject Matter Eligibility Contentions, Samsung provides the following chart identifying any other factual or legal basis for why the Challenged Claims are otherwise ineligible for patent protection.

Challenged Claims	Other Bases for Why the Challenged Claims are Patent-Ineligible
1-55	The challenged claims reflect long-understood and well-known concepts in linguistics, computational linguistics, and natural language understanding, as reflected in the cited references, in addition to the following: Bub, T., Wahlster, W., & Waibel, A. Verbmobil: The combination of deep and shallow processing for spontaneous speech translation. German Research Center for Artificial Intelligence; Carnegie Mellon University. Oh, A. H., & Rudnicky, A. I.. Stochastic language generation for spoken dialogue systems. Carnegie Mellon University. Batliner, A., Zeißler, V., Frank, C., Adelhardt, J., Shi, R. P., & Nöth, E. (2003). We are not amused – But how do you know? User states in a multi-modal dialogue system. University of Erlangen-Nuremberg. Aust, H., Oerder, M., Seide, F., & Steinbiss, V. (1995). A spoken language inquiry system for automatic train timetable information. Philips Research Laboratories. Jönsson, A.. A dialogue manager using initiative-response units and distributed control. Linköping University. Aust, H., Oerder, M., Seide, F., & Steinbiss, V. (1994). Experience with the Philips automatic train timetable information system. Philips Research Laboratories. Juneja, A. (2004). Approaches to dialogue system design. Carnegie Mellon University.

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Challenged Claims	Other Bases for Why the Challenged Claims are Patent-Ineligible
	Allen, J. F., Byron, D. K., Dzikovska, M., Ferguson, G., Galescu, L., & Stent, A. (2001). Towards conversational human-computer interaction. <i>AI Magazine</i>, 22(4), 27–37. Gorin, A. L., Parker, B. A., Sachs, R. M., & Wilpon, J. G. (1996). How may I help you? AT&T Research. Allen, J., Byron, D., Dzikovska, M., Ferguson, G., Galescu, L., & Stent, A. (1998). An architecture for a generic dialogue shell. <i>Natural Language Engineering</i>, 1(1), 1–24. Veldhuijzen van Zanten, G. (1998). Adaptive mixed-initiative dialogue management. IPO Center for Research on User-System Interaction. Allen, J., Ferguson, G., & Stent, A. (2001). An architecture for more realistic conversational systems. University of Rochester. Banuazizi, A., & Creswell, C. (n.d.). Is that a real question?: Final rises, final falls and discourse function in yes-no question intonation. University of Pennsylvania. Bohus, D., Raux, A., Harris, T. K., Eskenazi, M., & Rudnicky, A. I. (2007). Olympus: An open-source framework for conversational spoken language interface research. Carnegie Mellon University. Blaylock, N. (2002). Managing communicative intentions in dialogue using a collaborative problem-solving model (Technical Report 774). University of Rochester. Microsoft. (2004). Microsoft Speech Server 2004: Product datasheet. Microsoft Corporation. Graesser, A. C., VanLehn, K., Rosé, C. P., Jordan, P. W., & Harter, D. (2001). Intelligent tutoring systems with conversational dialogue. <i>AI Magazine</i>, 22(4), 39–51.

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Challenged Claims	Other Bases for Why the Challenged Claims are Patent-Ineligible
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Challenged Claims	Other Bases for Why the Challenged Claims are Patent-Ineligible
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