

Paper No. _____
Filed: November 13, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, SERVICES LLC,
Petitioner,

v.

VB ASSETS, LLC,
Patent Owner.

Case No. IPR2025-01379
Patent No. 10,755,699

PATENT OWNER'S PRELIMINARY RESPONSE

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I. INTRODUCTION

Patent Owner VB Assets, LLC (“Patent Owner”) requests denial of *inter partes* review of the involved U.S. Patent No. 10,755,699 (the “’699 patent”).

Petitioner Amazon.com, Services LLC (“Petitioner”) has failed to demonstrate a reasonable likelihood that at least one of the claims challenged in the petition is unpatentable. 35 U.S.C. §324(a). Petitioner challenges all claims of the ’699 patent, including both independent claims, on a single ground: Ground 1.

Petitioner’s challenge fails for numerous reasons described below.

In Ground 1, Petitioner fails to meet its burden of showing that the combination of Kennewick (EX1004), Cooper (EX1005), and Matsuda (EX1006; English translation, EX1007) renders each limitation of the independent claims obvious. For example, with respect to limitation [1.a],¹ Petitioner’s arguments create an inconsistent mapping, relying on a prior art component as allegedly receiving a natural language utterance without acknowledging that particular component is distinct from the processor identified as performing the claimed

¹ Petitioner’s labeling for the claim limitations is used in this preliminary response.

method.² *See infra*, §III.A.1. Regarding limitation, [1.e], Petitioner fails to explain how the user's input received during the prescribed time disclosed in Matsuda is an utterance received during a *predetermined time*, given Matsuda teaches dynamically resetting the timer associated with the prescribed time as the user's conversation progresses. *See infra*, §III.A.2. Next, for limitation [1.f], Petitioner fails to explain how a POSA would have combined the differing approaches of Kennewick's voice-triggered dialog and Matsuda's time-based speech assessments, let alone how such a combination would have been reasonably expected to succeed. *See infra*, §III.A.3. Lastly, for limitation [1.g], Petitioner's rationale to further combine the teachings of Cooper with Petitioner's Kennewick-Matsuda combination is insufficient because it ignores Petitioner's reliance on Matsuda to disclose both accumulating the *short-term knowledge* and *long-term knowledge*. *See infra*, §III.A.4.

Regarding independent claim 12, Petitioner's arguments are improper because they provide nothing beyond a cursory claim limitation comparison with claim 1 and citations to Petitioner's previous arguments. *See infra*, §III.A.5. Additionally, because Petitioner incorporates its claim 1 arguments into its claim 12 discussion, Petitioner's arguments are similarly flawed as described below. *Id.*

² Claim language is italicized throughout this preliminary response.

Accordingly, for the reasons detailed below, the Director should deny institution of the petition.

II. CLAIM CONSTRUCTION

In an IPR, claims are given their ordinary and customary meaning in light of the specification. 37 CFR §42.100(b). The petition purports to “appl[y] plain-and-ordinary meaning to all terms.” Pet., 8. However, while Patent Owner submits that no constructions are necessary to deny institution, in the parallel district court proceeding, Petitioner has proffered explicit constructions for terms recited in the challenged claims of the ’699 patent. As explained below, Petitioner fails to acknowledge these different constructions—providing no explanation as to how these constructions are consistent with its application of plain and ordinary meaning in the petition. This failure renders the petition deficient for failing to set forth “[h]ow the challenged claim is to be construed.” 37 C.F.R. §42.104(b)(3); *see also Revvo Techs., Inc. v. Cerebrum Sensor Techs., Inc.*, IPR2025-00632, Paper 20 at 2, 3-4 (Director Nov. 3, 2025) (precedential) (vacating decision granting institution in view of petitioner’s differing claim constructions before the Board and the district court).

Prior to the filing of this petition, Petitioner advanced several constructions for terms recited in the challenged claims. *See generally* EX2008. For example, Petitioner has proffered constructions for the terms, *context* and *a manner in which*

the natural language utterance was spoken, recited in each of the independent claims. *Id.*, 2. Petitioner also explicitly construes *speech recognition engine* and *contextual signifiers* as recited in dependent claims 7/18 and 4/15, respectively. *Id.*, 3. The petition does not mention these constructions or purport to apply them in the obviousness analysis.

Moreover, with respect to the limitation *contextual signifiers*, recited in claims 4 and 15, Petitioner has contended that this limitation is indefinite. EX2008, 3; *cf. Facebook, Inc. v. Sound View Innovations, LLC*, IPR2017-00998, Paper 13 at 17-18 (PTAB Sept. 5, 2017) (noting petitioner’s failure to inform Board “that it was simultaneously arguing a different treatment of the terms of [the challenged claim] before the district court” as reason for denial). Petitioner’s district court assertion that the limitations are indefinite “is a statement that the proper claim scope cannot be ascertained, which is inconsistent with Petitioner’s assertion that [the Board] should make an unpatentability determination.”

Monolithic Power Sys., Inc. v. Volterra Semiconductor LLC, IPR2020-01370, Paper 18 at 15-16 (PTAB Mar. 4, 2021). Because the petition fails to provide any explanation as to how the Board could address the limitations consistently with Petitioner’s indefiniteness arguments, the petition should be found deficient for failing to specifically identify how the challenged claims are to be construed.

Tesla, Inc. v. Intellectual Ventures II LLC, IPR2025-00340, Paper 18 at 3-4

(Director Nov. 5, 2025) (informative) (finding inability to argue indefiniteness in an IPR is insufficient to show why different claim construction positions are warranted).

III. ANALYSIS

A. Ground 1: Petitioner fails to show Kennewick, Matsuda, and Cooper teach every limitation of independent claims 1 and 12

Ground 1 of the petition challenges claims 1-22 as obvious based on a proposed combination of Kennewick, Cooper, and Matsuda. Pet., 3-4. Petitioner fails to meet its burden in showing that the combination of Kennewick, Cooper, and Matsuda renders these claims obvious because the petition fails to show that the proposed combination teaches each and every limitation of independent claim 1, including limitations [1.a] and [1.e]-[1.g], and their corresponding limitations in independent claim 12. The petition also fails to provide a sufficient rationale explaining why a POSA would have combined Kennewick, Cooper, and Matsuda to arrive at the claimed invention.

1. Petitioner fails to show Kennewick teaches limitation [1.a]

Petitioner fails to properly explain how Kennewick teaches *receiving, by the computer system, a user input comprising a natural language utterance*, as claimed. Petitioner's flawed arguments are inconsistent with its previous arguments discussing the claim 1 preamble. Specifically, in limitation [1.a], Petitioner relies on Kennewick's disclosure of an external microphone to teach

receiving, by the computer system, a user input but fails to show how this is accomplished by the “processing unit(s)” Petitioner relies on when mapping to the preamble’s claimed computer system ... [that] includes one or more physical processors.

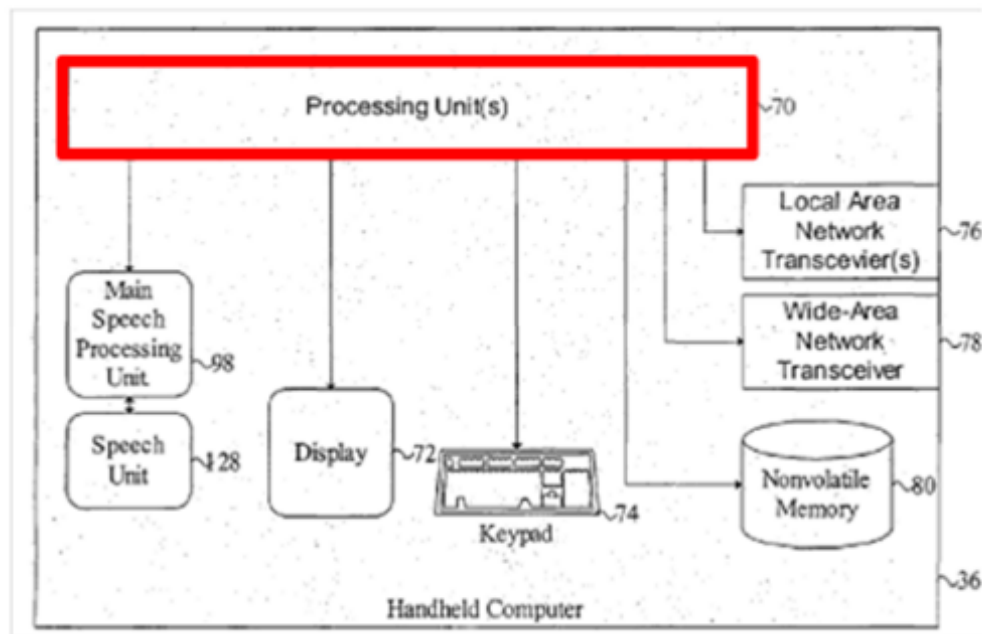
Petitioner’s limitation [1.a] arguments fail for being inconsistent with its claim mappings elsewhere. The preamble recites a *computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method* of claim 1. Each of the subsequently recited method steps are thus performed by the *one or more physical processors* of the preamble.³ This includes element [1.a], which requires *receiving, by the computer system, a user input comprising a natural language utterance.*

To show Kennewick teaches the above limitation of the preamble, Petitioner relies on Kennewick’s “fixed computer” and “handheld computer” embodiments of Figs. 3 and 4, both of which integrate speech unit 128 into the same computer as main speech processing unit 98. Pet. 10 (citing EX1004, ¶107); EX1004, ¶107 (speech unit is “embedded in one or more of the ... handheld computers 36 and

³ In the related district court litigation, Petitioner contends the preamble is limiting. EX2008, 2.

fixed computer systems 44.”), Figs. 3, 4. Discussing Figures 3 and 4 of Kennewick, Petitioner asserts that “[t]hese embodiments of the computer are each a ‘*computer system*’ because they are formed of various computing components working together.” Pet., 10.

Having identified the fixed and handheld computer systems of Figures 3 and 4, respectively, as mapping to the claimed computer system, Petitioner then identifies the “processing unit(s)” of these handheld and fixed computers as the claimed *one or more physical processors*:



Pet. 10 (citing annotated version of EX1004, Figure 3). In the words of Petitioner, “Figure 3, shown above, illustrates that the computer system has ‘processing units’ Kennewick’s computer system thus ‘*includes one or more physical*

processors.” Pet., 10-11. The petition does not identify any other alleged processor in this discussion. *Id.*

However, when addressing limitation [1a], Petitioner cites a different embodiment of Kennewick, turning to Figure 5. Pet. 15-16. Petitioner relies on speech unit 128 from Figure 5 as satisfying the *receiving* step. *Id.* (“The ‘speech unit 128 includes one or more microphones...to receive the utterances of the user,’ which are ‘a ser input comprising a natural language utterance.’”). As highlighted by the petition’s annotated version of Figure 5, speech unit 128 is physically separate from main unit 98 where the majority of Kennewick’s speech interpretation and other processing takes place:

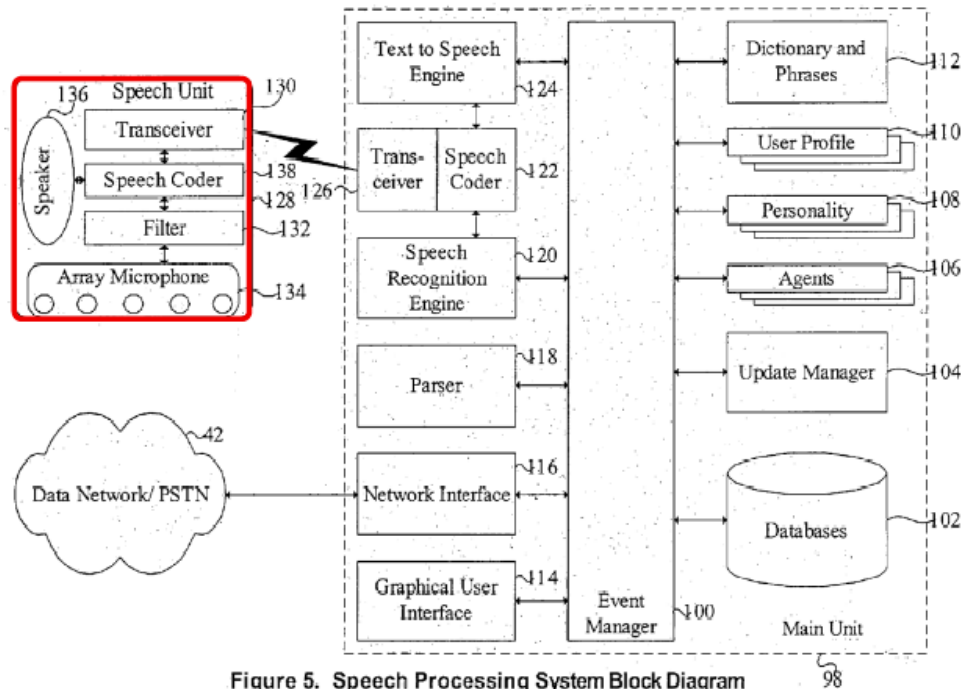


Figure 5. Speech Processing System Block Diagram

Pet., 16. Confirming that Figure 5's speech unit 128 and main unit 98 are distinct, Kennewick explains that "a transceiver module 130 transmits the coded speech to the main unit 98." EX1004, ¶121.

In its limitation [1a] discussion, Petitioner does not provide discussion of what *processor* it asserts performs the *receiving* step in Kennewick. Pet., 15-16. Nor does Petitioner allege that Kennewick's "processor unit(s)" cited on earlier in the petition would perform the recited *receiving* step. *Id.* The petition is simply silent on this aspect of the claims, despite reliance on a separate, **external** speech unit and its disclosed microphones when mapping to limitation [1a]. Petitioner's mapping creates an inconsistency, given that the Figure 5 speech unit is a separate device that transmits data wirelessly to the main unit where the other speech processing components are located. Pet. 15-16 (citing EX1004, ¶¶107, 121, Fig. 5); EX1004, ¶¶107 (main unit and speech unit can be "independent components"), 121-24, Fig. 5. Conversely, Petitioner also does not rely on the transceiver, speech coder, or any other component in the main unit as performing the claimed *receiving* step, which would have entailed explaining how receipt of encoded wireless transmissions satisfies the requirement that what is received is the *natural language utterance*, as required by the claims. EX1004, ¶121.

Accordingly, Petitioner fails to establish that Kennewick discloses limitation [1.a].

1. Petitioner fails to show Kennewick and Matsuda teach limitation [1.e]

Petitioner also fails to show how the combination discloses *accumulating ... short-term knowledge based on one or more natural language utterances received during a predetermined time period*, as claimed. Petitioner relies on Matsuda to teach this limitation but fails to show how the user's input received prior to a prescribed time elapsing as disclosed in Matsuda is an utterance received during a *predetermined time period*. The timer associated with the prescribed time taught by Matsuda is reset dynamically based on the conversation with the user and thus the stored information from the user's input is not accumulated during a predetermined time. Moreover, in the event the timer is not reset, Petitioner fails to explain how any *short-term knowledge* is accumulated.

To start, Petitioner acknowledges Kennewick fails to teach *accumulating ... short-term knowledge based on one or more natural language utterances received during a predetermined time period*. Pet. 22. Petitioner thus relies on Matsuda for this limitation, contending that reference discloses “stor[ing] information about a person who is the subject of a conversation” for a “prescribed time.” Pet. 22-23. Petitioner asserts that in Matsuda “[w]hen a user first mentions a person during a conversation with the system, Matsuda's system establishes that person as the current subject by storing the subject's person number as the subject person number.” Pet. 23. Furthermore, Petitioner alleges Matsuda teaches “[w]hen the

subject person number is established, the system tracks elapsed time since the subject person was last mentioned by the user” and “expires the subject person number if the elapsed time exceeds” the prescribed time. Pet. 23. As an example, Petitioner asserts that Matsuda teaches if the conversation subject is “Matsui of the Kyo,” and the user utters “Matsui is strong” during the “prescribed time” the system infers that “Matsui” is the same person as “Matsui of the Kyo.” Pet. 24. Thus, Petitioner concludes that Matsuda’s system accumulates inferred name information about the subject person (i.e., *short-term knowledge*) derived from the user’s input (i.e., *natural language utterances*) within the prescribed time (i.e., *predetermined time period*). Pet. 24.

However, even taking the petition’s characterization of Matsuda’s operation as true, Petitioner’s arguments are fundamentally flawed because they fail to explain how Matsuda’s dynamically reset timer associated with the prescribed time equates to the claimed *predetermined time period*. As Petitioner admits, Matsuda teaches tracking the elapsed time **since the subject person was last mentioned** and only expiring the timer after the “prescribed time” has elapsed since the subject was last mentioned. Pet. 23 (citing EX1007, ¶¶27, 38, 69). In other words, the amount of time that data is being accumulated about a conversation subject based on the user’s input is variable and dynamic depending on how the conversation is progressing. The only way Matsuda’s prescribed time is applied is

if the subject name is not spoken during that period. Thus, Matsuda does not teach accumulating name data information about the conversation subject for a predetermined period of time as Petitioner alleges. Petitioner fails to explain or even address this discrepancy.

To the extent Petitioner intended to argue Matsuda's prescribed time would be the claimed *predetermined time period* in the scenario where a conversation subject is mentioned once and never again—which the petition does not explicitly contend—this argument would also fall short. Petitioner relies on Matsuda by incorporating its alleged disclosure of “identifying a conversation subject and additional names for the subject spoken within the predetermined time period into Kennewick's system.” Pet. 25. But, based on Petitioner's own explanation, in the scenario where the user fails to mention the subject name during the prescribed time, Matsuda's system would not accumulate any name data about the subject. Pet. 24. Thus, Petitioner's arguments are insufficient because Petitioner relies on this stored name data during the prescribed time to teach *accumulating... short-term knowledge* based on utterances received *during a predetermined time period*, as claimed, and there would be no accumulated short-term knowledge. Pet. 24.

Accordingly, Petitioner fails to establish that Kennewick and Matsuda, alone or in combination, discloses limitation [1.e].

2. Petitioner fails to show Kennewick and Matsuda teach limitation [1.f]

Petitioner fails to sufficiently provide a rationale to combine Kennewick and Matsuda to teach *accumulating ... long-term knowledge, wherein the long-term knowledge is accumulated based on one or more natural language utterances received prior to the predetermined time period*, as claimed. For example, Petitioner fails to properly explain how a POSA would have had a reasonable expectation of success in combining these references' teachings, providing no explanation as to how Kennewick's voice triggered dialog would have been combined with Matsuda's timer. This lack of explanation is particularly damaging due to the plethora of facially obvious issues with such a combination.

As an initial matter, Petitioner's assertion of reasonable expectation of success is insufficient for being conclusory. On this point, the petition merely provides a single sentence that states a "POSITA would have found the results of this combination predictable and would have reasonably expected the results to be successful, because it would enable the combined system to better respond to the user in a more natural way." Pet. 31-32 (citing EX1002, ¶129). The cited expert testimony only repeats this bald assertion without adding supporting analysis. Thus, Petitioner's sole support for its assertions, its expert's testimony, should be given little weight, if any. Pet. 31-32; *see also Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 at 15 (precedential); 37 C.F.R. §42.104(b)(4). This

problem is only exacerbated by facially apparent deficiencies in the Kennewick-Matsuda combination, as discussed below.

Petitioner's proposed combination is flawed because Petitioner fails to explain, or even address, how Matsuda's disclosed timer and Kennewick's voice-triggered, user-system dialog would have been combined. Petitioner proposes to "incorporate Matsuda's disclosure related to accumulating information received prior to a predetermined time period, e.g., name data, to provide additional information for use by Kennewick's system to identify conversation subjects and achieve the natural environment." Pet., 31. Yet Petitioner never reconciles Matsuda's timing-based teachings with Kennewick's disclosures that its conversations begin and end based on spoken triggers, not time durations.

Petitioner argues that a POSA would have understood Kennewick's alleged disclosure of a user-system dialog to include conversations "prior to" the current conversation. Pet. 28. Petitioner further argues a POSA would have also understood Kennewick's alleged disclosure of accumulating information from "past or historical conversations" to teach *accumulat[ing] ... long-term knowledge ... based on one or more natural language utterances received prior to the single conversation* of limitation [1.e]." Pet. 27-28 (cleaned up). In limitation [1.e], Petitioner maps the claimed *conversation* to Kennewick's alleged disclosure of a user-system dialog which "start[s] with the user addressing the computer system

and end[s] with the user uttering a dismissal word.” Pet. 21. Thus, Petitioner acknowledges that the dialogs in Kennewick are triggered by user speech, both at the beginning and the end of the dialog.

In contrast, Petitioner relies on Matsuda’s teachings regarding tracking time elapsed since a subject name has been spoken. Indeed, that is the very reason Petitioner turns to Matsuda in its combination. For example, in limitation [1.e], Petitioner maps Matsuda’s alleged disclosure of “accumulat[ing] name information” during the “prescribed time” to the claimed *short-term knowledge* that is accumulated based on utterances *received during to the predetermined time period* that are *related to a single conversation*. Pet. 24. However, Petitioner never explains the relationship between starting and stopping of Kennewick’s user dialog (which defines the dialog duration in Kennewick that Petitioner maps to the claimed *conversation*) and Matsuda’s “prescribed time” which Petitioner proposes incorporating into Kennewick. For example, Petitioner does not explain whether it proposes to **modify** the relied-upon Kennewick dialog such that it extends for one or more of the predetermined time periods described in Matsuda, or to **add** the predetermined time periods to Kennewick in some way that might overlap with or fit within the separately-determined dialog length, or something else. The petition is silent as to how Matsuda’s time monitoring might be combined with Kennewick’s speech-driven dialog length. Petitioner’s failure to address the

discrepancies between the references undermines its already-conclusory arguments regarding motivation to combine and reasonable expectation of success. Pet. 31-32.

Petitioner's lack of explanation regarding how the Kennewick-Matsuda combination would work is particularly problematic in view of facially-apparent substantive issues with Petitioner's combination arising from the references' two different approaches. This is true regardless of how Petitioner intended to combine these references' teachings: whether Matsuda's timer acts independently of or coextensively with the beginning and end of Kennewick's user-system dialog. Either way, the distinction between the claimed short-term and long-term knowledge is lost, such that Petitioner's obviousness challenge becomes an arbitrary claim-mapping exercise.

For example, to the extent Matsuda's timer acted independently of the duration of Kennewick's user-system dialog, there are at least two issues Petitioner fails to acknowledge or address. Petitioner relies on Kennewick as purportedly teaching accumulating long-term knowledge based on "conversations before (*prior to*) the single conversation" and contends Matsuda teaches accumulating long-term knowledge "before the user established the predetermined time period by introducing a conversation subject into the current conversation." Pet., 28-29. However, if Matsuda's timer starts after Kennewick's alleged *conversation* begins,

it would result in Matsuda's alleged *long-term knowledge* being part of Kennewick's alleged *conversation*. That is, what Petitioner relies upon as *long-term knowledge* would be indistinguishable from what it also calls *short-term knowledge*. See, e.g., Pet., 22 ("Kennewick's computer system 'accumulat[es]' the short-term knowledge by tagging each natural language utterance received **during the dialog.**") (emphasis added). This contravenes Petitioner's reliance on Kennewick as allegedly teaching accumulating *long-term knowledge* because it "accumulates information from past or historical conversations." Pet. 27. Petitioner fails to explain how or why a POSA would have modified Kennewick such that this stored information from historic conversations further included subject name data of the current conversation. Pet. 27-28.

A second problem arises if the proposed combination is intended to incorporate Matsuda's timer such that it acts independently of Kennewick's user-system dialog. Namely, if Matsuda's prescribed time for tracking subject names was not yet expired at the time a user ended a system dialog per Kennewick's teachings, that would mean that the Matsuda timer could overlap with a subsequent Kennewick dialog and the claimed *short-term knowledge* would be associated with multiple conversations, which is at odds with what is required in limitation [1.e].

Alternatively, to the extent Petitioner intended to argue Matsuda's timer is coextensive with Kennewick's user-system dialog in the combination, such that

Kennewick’s approach to defining a dialog was modified to be based on Matsuda’s renewable prescribed time period, Petitioner likewise fails to show a reasonable expectation of success. Namely, Petitioner fails to explain why a POSA would have been motivated to modify Kennewick to further include the timer of Matsuda when Kennewick already discloses, and Petitioner relies on, ending a conversation with a voice trigger from a dismissal word. Pet. 21 (citing EX1004, ¶156).

Petitioner does not acknowledge the differing approaches in Kennewick and Matsuda, let alone explain how a POSA might have combined them with a reasonable expectation of success. *Cf., ActiveVideo Networks, Inc. v. Verizon Comms., Inc.*, 694 F.3d 1312, 1327-28 (Fed. Cir. 2012) (affirming no invalidity where expert testimony was “conclusory” and “failed to explain how specific references could be combined, which combination(s) of elements in specific references would yield a predictable result, or how any specific combination would operate or read on the asserted claims”).

Accordingly, Petitioner fails to establish that Kennewick and Matsuda, alone or in combination, discloses limitation [1.f].

3. Petitioner fails to show Kennewick, Matsuda, and Cooper teach limitation [1.g]

Petitioner fails provide a proper rationale to further combine Cooper with its Kennewick-Matsuda combination to teach *identif[ing] a manner in which the natural language utterance was spoken based on the short-term knowledge and the*

long-term knowledge, as claimed. In particular, Petitioner’s rationale to combine the teachings of Cooper with the Kennewick-Matsuda combination ignores Petitioner’s previous reliance on Matsuda’s disclosure as teaching both accumulating the claimed *short-term knowledge* and *long-term knowledge*.

First, Petitioner fails to properly provide a rationale to combine the teachings of Kennewick and Matsuda with the teachings of Cooper to *identify a manner* the *utterance* was spoken *based on the short-term knowledge*, as required by the claims. Petitioner admits to relying on the Kennewick-Matsuda combination for “accumulating ‘*short-term knowledge*’” but then fails to even mention Matsuda in its rationale to combine regarding limitation [1g]. Pet. 32-34. This omission undermines Petitioner’s arguments because, as described above, Petitioner explicitly maps *short-term knowledge* to Matsuda’s alleged disclosure of storing “additional names for a conversation subject mentioned within a predetermined time period.” Pet. 25-26; *supra*, §III.A.2. Moreover, Petitioner also explicitly “incorporate[es] Matsuda’s accumulated information into Kennewick” as part its Kennewick-Matsuda combination. Pet. 25-26. Petitioner then improperly sidesteps this prior reliance on Matsuda and argues only that it would have been obvious to modify Kennewick’s alleged lone disclosure of *short-term knowledge* with Cooper’s teachings. Specifically, Petitioner asserts that “Kennewick’s computer system accumulates the short-term knowledge from the dialog” and

“Cooper discloses using the words of the dialog to identify the manner in which the user is speaking.” Pet. 33-34. Thus, Petitioner’s arguments are critically flawed—even if taken as true—because Petitioner fails to explain why it would have been obvious to modify, with Cooper’s teachings, the conversation subject name data of Matsuda that Petitioner relies on in the Kennewick-Matsuda combination as teaching the claimed *short-term knowledge*.

Second, and for similar reasons, Petitioner also fails to properly provide a rationale to combine the teachings of Kennewick and Matsuda with the teachings of Cooper to *identify a manner the utterance was spoken based on the long-term knowledge*. Similar to above, Petitioner’s rationale to combine fails to even acknowledge the Kennewick-Matsuda combination despite relying on Matsuda’s alleged disclosure to teach *accumulating ... long-term knowledge* that is based on utterances *received prior to the predetermined time period*. Pet. 28-29, 34-36. In limitation [1.f], Petitioner argues that a POSA would have understood Matsuda’s “name data is accumulated based on one or more natural language utterances as users converse with the system over time and **is long-term knowledge**.” Pet. 29 (cleaned up) (emphasis added). As an example, Petitioner explained that the system stores “name data” about “Matsui” in a prior conversation and uses it to identify a conversation subject of a later conversation. Pet. 29. Here, however, Petitioner again attempts to abandon its previous arguments and asserts only that a

POSA would have found it obvious to combine Cooper with Kennewick.

Specifically, Petitioner argues that Kennewick “accumulates long-term knowledge by storing ... information from past sessions” and Cooper teaches “saving ... user emotional state information.” Pet. 34-35. Nowhere, does Petitioner provide a rationale to modify Matsuda’s alleged disclosure of accumulated “name data” from previous conversations which Petitioner relies on to teach the claimed *long-term knowledge*. Thus, Petitioner’s rationale to combine is fatally flawed.

Accordingly, Petitioner fails to establish that Kennewick, Matsuda, or Cooper, alone or in combination, discloses limitation [1.g].

4. Petitioner fails to show the combination teaches independent claim 12

Petitioner’s arguments regarding independent claim 12 are also insufficient and flawed. First, Petitioner’s arguments are insufficient because Petitioner provides no substantive analysis past referencing its previous arguments regarding claim 1. Second, Petitioner fails to explain how the claimed system’s processors are *configured to receive a user input comprising a natural language utterance*, as required, given the user’s input is received and processed by an independent, external device.

First, Petitioner’s arguments are deficient because they merely cite to Petitioner’s previous, flawed arguments with respect to claim 1. Petitioner asserts that the “combination of Kennewick, Cooper, and Matsuda renders claim 12

unpatentable for the same reasons as claim 1” because the limitations of claim 12 are “substantively identical” to those of claim 1. Pet. 56-57. Petitioner’s only analysis to support this assertion comprises conclusory assertions of similarity, reciting limitations [12.pre] and [12.a], and an additional conclusory assertion that the *computer system* discussed in claim 1 is “equivalent” to the *system* of claim 12. Thus, at the very least, Petitioner’s claim 12 arguments fail for the reasons discussed above. *Supra*, §§III.A.1-4. Moreover, this type of cursory analysis that merely references arguments made elsewhere in the petition has been recognized as insufficient. *See Zhuhai CosMX Battery Co., Ltd. v. Ningde Amperex Technology Ltd.*, IPR2025-00405, Paper 24 at 2-3 (vacating and denying institution, noting petitioner failed to present separate arguments and just referred to previous arguments). The absence of substantive analysis is particularly egregious here because Petitioner’s supporting expert testimony provides only the same cursory assertions found in the petition. Pet. 56-57 (citing EX1002, ¶200); EX1002, ¶200; *Xerox* at 15. Accordingly, Petitioner’s claim 12 analysis is further insufficient for this reason.

Second, similar to above, Petitioner fails to explain how the external, independent speech unit receiving the user input teaches *processors ... configured to receive a user input comprising a natural language utterance*, as required by the claim. *Supra*, §III.A.1. To show Kennewick teaches this limitation, Petitioner

cites to its claim 1 preamble discussion of the claimed *one or more physical processors*. Pet. 56-57. In the claim 1 preamble, Petitioner relies on Kennewick's alleged disclosure of "processing units" in Kennewick's Figs. 3-4 embodiments to argue Kennewick teaches *one or more physical processors*. Pet. 10-11. However, as discussed above, Petitioner relies on the "external microphones" inside the independent, external speech unit in Kennewick's Fig. 5 embodiment to teach *receiv[ing] a user input comprising a natural language utterance*, as claimed. EX1004, ¶121, Fig. 5; *supra*, §III.A.1. Thus, Petitioner's arguments are additionally flawed with respect to claim 12 because Petitioner fails to explain how the processing units of Kennewick's alleged system would be *configured to receive a user input* in Kennewick's Fig. 5 embodiment, as required by the claims, when the user input is being received and processed by independent, external devices. EX1004, ¶¶107 (main speech processing unit and the speech unit can be "independent components"), 121, Fig. 5.

Accordingly, Petitioner fails to establish that Kennewick, Matsuda, or Cooper, alone or in combination, discloses each limitation of claim 12.

5. Petitioner fails to show that the proposed combination renders obvious dependent claims 2-11 and 13-22

Dependent claims 2-11 and 13-22 each depend from either independent claim 1 or 12 and thus Petitioner also fails to meet its burden with respect to each

of these claims for at least the reasons discussed above with respect to independent claims 1 and 12.

IV. CONCLUSION

Petitioner has failed to demonstrate a reasonable likelihood that at least one of the claims challenged in the petition is unpatentable. Accordingly, Patent Owner respectfully requests that the Director deny the petition.

Respectfully submitted,

Date: November 13, 2025

/ Matthew A. Argenti /
Matthew A. Argenti, Lead Counsel
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CERTIFICATE OF COMPLIANCE

Pursuant to §42.24(d), the undersigned certifies that this paper contains no more than 14,000 words, not including the portions of the paper exempted by §42.24(b). According to the word-processing system used to prepare this paper, the paper contains 4744 words.

Respectfully submitted,

Date: November 13, 2025

/ Matthew A. Argenti / _____
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Patent Owner's Preliminary Response was served on November 13, 2025, on the Petitioner at the electronic correspondence address of the Petitioner as follows:

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