UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOHO CORPORATION and
ZOHO CORPORATION PVT., LTD.
Petitioners,

v.

MEETRIX IP, LLC,
Patent Owner.

Case IPR2023-00378
U.S. Patent No. 9,094,525
(Claims 1-8)

PETITIONERS' REPLY TO PATENT OWNER RESPONSE

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1005	File History of Application No. 13/674,233 (the '233 application)
1006	U.S. Patent No. 7,180,997 ("Knappe")
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1008	U.S. Patent No. 7,089,285 ("Drell")
1010	Guichard *et al*., "MPLS and VPN Architectures, A practical guide to understanding, designing and deploying MPLS and MPLS-enabled VPNs," Cisco Press, 2001 ("VPN Textbook")
1011	Declaration of Ingrid Hsieh-Yee, Ph.D., under 37 C.F.R. § 1.68
1012	U.S. Patent No. 3,060,265
1013	U.S. Patent No. 4,139,731
1014	U.S. Patent No. 3,601,530
1015	U.S. Patent No. 4,796,293
1016	A Primer on the T.120 Series Standard
1017	T.120 Standard (1996)
1018	U.S. Patent No. 6,237,025
1019	U.S. Patent No. 6,782,413
1020	U.S. Patent No. 6,980,526

Ex.	Description
1021	Caputo, "Cisco Packetized Voice & Data Integration," McGraw-Hill, 2000
1022	De Moraes *et al.*, "The Internet Multicast from ITS: How it was Done and Implications for the Future," IEEE Communications Magazine, January 1995
1023	U.S. Patent Publication No. 2004/0261116 A1
1024	U.S. Patent No. 6,850,496
1025	U.S. Patent No. 6,553,515
1026	U.S. Patent No. 6,633,848
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1036	U.S. Patent No. 6,215,515 ("Voois")
1046	Declaration of C.J. Alice Chuang

I. INTRODUCTION

The Patent Owner Response ("POR") fails to rebut the Petition or the Board's preliminary findings that the challenged claims are unpatentable. Instead, the POR provides unsupported and conclusory attorney argument that largely fails to follow the legally appropriate approach to rebut the obviousness evidence presented in the Petition. The attorney arguments in the POR attempt to rebut obviousness by challenging prior art references individually instead of the presented combination, mischaracterizing the teachings of the prior art. The arguments also lack support from or citations to the record. Not even Patent Owner's purported technical expert, Mr. Dye, one of the inventors and the founder and former CEO of Meetrix (the Patent Owner), signed on to support these baseless attorney arguments; from his 26-paragraph declaration (Ex_2001) only two paragraphs (paragraphs 21-22) are cited just once to support Patent Owner's non-obviousness arguments.

II. THE BOARD SHOULD DISREGARD PATENT OWNER'S IRRELEVANT ARGUMENT REGARDING THE LEVEL OF ORDINARY SKILL IN THE ART AND CLAIM CONSTRUCTION

In the POR, Patent Owner disagrees with Petitioners that a person of ordinary skill in the art ("POSITA") would have at least three years of experience relating to conferencing systems in packet-based networks, claiming the requirement is "too specialized." POR at 11. Patent Owner instead contends that a

POSITA relevant to the ’525 patent would have **no** relevant experience in the field of the alleged invention but only generic experience in “computer systems development.” *Id*. at 12. The ’525 patent, however, specifically notes that the invention “relates to computer system architectures, and **more particularly to audio and video telecommunications for collaboration over hybrid networks**.” Ex_1001 at 1:18-20 (emphasis added). A POSITA’s credentials should at least include experience in the field of the invention as recited by the patent.

Not only is Patent Owner’s proposal clearly wrong but any alleged dispute over the level of ordinary skill in the art is actually irrelevant since none of the arguments in the POR turn on the disagreement over a POSITA’s experience level. While having a few years of work experience in the actual field of the invention is not “too specialized” a requirement for a POSITA, under either definition the result is the same: the challenged claims are unpatentable.

The Patent Owner also disagrees with Petitioners’ assertion that, for purposes of this Petition, “no claim term requires express construction for the Board to evaluate the patentability of the claims.” POR at 12. The POR then proceeds to list 13 claim terms with corresponding constructions adopted by a District Court in a litigation with another party. *Id*. at 12-13. But not all these terms actually appear in claims 1-8 of the ’525 patent. Moreover, the subsequent Patent Owner arguments do not actually rely on any of these claim constructions or

suggest that Petitioners' arguments are inconsistent with any of these constructions. Thus, this disagreement is also irrelevant. The application of the prior art references in the Petition to the actual claim language of the challenged claims does not require any of these constructions nor is it at odds with them. Under the plain and ordinary meaning of the claim terms, the challenged claims are unpatentable.

III. RESPONSE TO PATENT OWNER ARGUMENTS[1]

In response to the Petitioners' grounds of rejection and the Board's institution decision, the POR either sets forth irrelevant arguments or relies on unsupported attorney argument with few citations to the record and virtually no evidentiary support, from the inventor declaration or otherwise. It is well established that "[a]rgument in the brief does not take the place of evidence in the record." *In re Schulze*, 346 F.2d 600, 602 (CCPA 1965). Further, the attorney argument challenging the obviousness rejections is largely based on improperly "attacking references individually where the rejection is based upon the teachings of a combination of references." *In re Merck & Co., Inc.*, 800 F. 2d 1091, 1097

[1] In Section III.D, the POR includes an argument regarding independent claim 19 and claim 25. POR at 19-20. The '525 patent does not have an independent claim 19 or a claim 25. Nor do claims 1-8 of the '525 patent include the claim limitation recited in Section III.D of the POR. Petitioners, therefore, assume the argument was inadvertently included in the POR and no response is necessary.

(Fed. Cir. 1986). Thus, the Patent Owner's arguments fail to overcome the Board's findings that claims 1-8 are unpatentable.

A. Grounds 1 and 3: The Prior Art Renders Obvious Claims 1-4

The Petition sets forth two grounds for cancelling claims 1-4 of the '525 patent: (a) Ground 1, based on the combination of Drell, Knappe, and Voois, and (b) Ground 3, based on the combination of Drell and Knappe. The POR does not address each ground separately. Therefore, Petitioners treat the POR's arguments with respect to claims 1-4 as applying to Grounds 1 and 3 equally and address them together below.

1. A POSITA Would Have Been Motivated to Combine Drell and Knappe

To start, Patent Owner argues that the combination of Drell and Knappe does not render claim 1 obvious because a POSITA would not have been motivated to combine the references. *See* POR at 16-17, 19 (III.A-B). The POR offers nothing more than conclusory argument and citation to two paragraphs in the named inventor's declaration. POR at 16-17, citing Ex_2001 ¶¶ 21-22. But the cited portions of the declaration do not even address the combination of Knappe and Drell. Instead, cited paragraphs 21-22 of Ex_2001 (Dye Decl.) discuss virtual private networks (VPNs) and whether a POSITA would be motivated to combine a different reference – Elliott (Ex_1007) – with Knappe and Drell. Claim 1 of the '525 patent does not, however, recite any VPN limitations. Nor do Petitioners rely

on the Elliott reference as grounds for invalidating claim 1. Thus, the POR presents no evidence having any bearing on claim 1 or any relevance to the motivation to combine Drell and Knappe.

The only thing the POR is left with is insufficient attorney argument to support the contention that a POSITA would not be motivated to combine Drell and Knappe. *See In re Schulze*, 346 F.2d at 602. In contrast, the Petition (supported by the testimony of Petitioners' independent expert (Ex_1003)) offers more than substantial evidence that a POSITA in the art would have been motivated to combine Drell with Knappe. For example (and specifically relevant to the "first mixer" limitation of claim 1 addressed by Patent Owner's argument in Section III.A of the POR (p. 16-17)), Petitioners explained and provided evidence demonstrating that Drell teaches a system that "combine[s] and distribute[s] audio and video signals received from a plurality of remote conference endpoints," while Knappe supplements and explains how to mix data received from multiple conference endpoints. Pet. at 18-19, citing Ex. 1003 (Houh Decl.) ¶¶ 154-160. Petitioners' expert, Dr. Houh, explained that a POSITA in the art would have understood the benefits of using the summers taught by Knappe in Drell's mixer and thus would have been motivated to combine the references. Ex_1003 ¶¶ 154-159; Pet. at 19. Indeed, Petitioners and Dr. Houh detailed numerous reasons why a POSITA would have been motivated to combine Drell and Knappe, none of which

Patent Owner addresses in the POR. *See* Pet. at 17-22, citing Ex_1003 ¶¶ 148-168. Thus, for the reasons stated in the Petition, a POSITA in the art would have been motivated to combine Drell with Knappe.

2. The Combination of Drell and Knappe Renders Obvious the "moderator" Limitation of Claim 1

The POR next argues that the Petitioners' identification of Drell's remote conference endpoint 104 cannot meet claim 1's requirement of a "moderator." POR at 17-19 (Sections III.A-C[2].). Again relying on only attorney argument, the POR argues that the "moderator in Drell has control over the network application for mixing and encoding" and Drell discloses that as existing in near conference endpoint 100, not remote conference endpoint 104. *Id*. at 17. Patent Owner's argument is based on a false premise and mischaracterizes the prior art.

Contrary to Patent Owner's argument, nothing in the '525 patent requires the claimed "moderator" to control the mixing and encoding. Nor is there anything in Drell or Knappe that indicates that if a moderator was implemented in the Drell system, the near conference endpoint 100 running the network application for

[2] Section III.C of the POR appears to argue that the combination of Drell and Knappe does not disclose the further limitation of claim 2 requiring a third mixer. For that argument, the POR simply restates its argument in Sections III.A-III.B relating to Drell's remote conference endpoint being the "moderator" despite the fact that the further limitation of claim 2 is not directed to any "moderator" requirement. Therefore, the argument in Section III.C of the POR does not appear to address claim 2, and is otherwise incorrect as explained above in Section III.A.2 of this Reply.

mixing and encoding would have to act as the moderator. There is no reason why a "moderator" in the Drell system would have to exist at near conference endpoint 100 where the application for mixing and encoding resides, and no reason Drell's remote conference endpoint 104 cannot serve as the moderator.

As explained in the Petition, Drell discloses use of a multi-point conference application embodied in near conference endpoint 100 that includes an audio mixing module and a video switching module that combines data received from other conference participants, such as remote conference endpoints 102 and 104. Pet. at 30-31, citing Ex_1008 at 5:8-20 and Ex_1003 ¶¶ 195-212. Knappe teaches that at least one conference participant can be designated as a moderator. Pet. at 29, citing Ex_1006 at 8:52-56. Thus, as set forth in the Petition, it would have been obvious to a POSITA that one of the participants in the Drell system could also be designated as a moderator, including, for example remote conference endpoint 104 (one of the participants in the Drell conferencing system). Pet. at 29-30, citing Ex_1003 ¶¶187-194. The POR has presented no evidence or support to suggest otherwise.

3. Drell and Knappe Renders Obvious the "VoIP Decoder that Receives IP Packets" Limitation of Claim 3

In Section III.E, the POR contends that the audio codec 408 of Drell does not disclose a "VoIP decoder that receives IP packets . . . [and] decodes the IP packets" as required by claim 3. POR at 21. Without any evidentiary support, the

POR relies solely on attorney argument to contend that audio codecs receive encoded/compressed audio and not IP packets. *Id*. Putting aside the lack of evidentiary support, the POR mischaracterizes Petitioners' position, myopically addressing only one part of Drell's disclosures while ignoring all of Drell's other teachings as well as disclosures in Knappe that support cancellation of claim 3. *See In re Merck*, 800 F. 2d at 1097 (finding it improper to attack references individually where the rejection is based upon the teachings of a combination of references).

Specifically, Petitioners did not contend that Drell's audio codec 408 alone discloses the "VoIP decoder" of claim 3. Indeed, Petitioners started by explaining because the systems in Drell and Knappe facilitate communications between participants connected through a network, including the Internet, a POSITA in the art would understand that the near conference endpoint 100 of Drell would receive IP packets because communications over the Internet use IP packets. Pet. at 51, citing Ex_1006 at 3:53-54 and Ex_1003 ¶¶ 271-272. And contrary to the argument in the POR, Drell explicitly teaches that audio codec 408 receives an audio data stream . . . . [and] decod[es] in accordance with a standard or proprietary audio compression algorithm." Pet. at 51-52, citing Ex_1008 at 6:18-23 and Ex_1003 ¶¶ 277-279. Indeed, Drell teaches that its communication process includes a "H.323 (packet-based) process," which is a well-known standard that specifies

encoding and decoding VoIP communications. Pet. at 52, citing Ex_1008 at 2:17-23 and Ex_1003 ¶¶ 280-281. The POR also ignores Petitioners' reliance on Knappe's disclosure of a "codec (coder/decoder)" for processing "IP packets such as VoIP packets . . . encapsulated in real-time transport protocol packets." Pet. at 52, citing Ex_1006 at 4:9-14, 3:50-57. Thus, the "VoIP decoder" of claim 3 is rendered obvious by the combination of Drell and Knappe. Pet. at 50-52; Ex_1003 ¶¶ 269-285.

B. Grounds 2 and 4: The Prior Art Renders Obvious Claims 5-8

The Petition sets forth two grounds for cancelling claims 5-8 of the '525 patent: (a) Ground 2, based on the combination of Drell, Knappe, Voois, Elliott, and the VPN Textbook and (b) Ground 4, based on the combination of Drell, Knappe, Elliott and the VPN Textbook. The POR does not address each ground separately. Therefore, Petitioners treat the POR's arguments with respect to claims 5-8 as applying to Grounds 2 and 4 equally (except to the extent they discuss Voois) and address them together below.

1. The USPTO Did Not Determine That the VPN Textbook (Ex_1010) Is Not Invalidating Prior Art

In summarizing Petitioners' grounds for cancellation of claims and reliance on the VPN Textbook, Patent Owner takes issue with Petitioners' reliance on the VPN Textbook as an invalidating prior art reference, incorrectly contending that "the USPTO has already determined that general VPN textbooks are not

invalidating prior art." POR at 14. Specifically, the POR asserts that because the applicant cited three Cisco Systems, Inc. publications during prosecution, somehow the VPN Textbook (Ex_1010), a book published by "Cisco Press" cannot serve as a basis to invalidate the challenged claims, alleging that Petitioners rely on the VPN Textbook "like a catalog of electronic components, to recreate the invention." POR at 15.

First, the POR provides no legal basis for the proposition that just because a prior art reference from a given publisher was disclosed during prosecution, all references from that publisher have somehow been considered and can no longer be used as invalidating prior art. This is clearly wrong. *See e.g., Hum Industrial Technology, Inc. v. Amsted Rail Company, Inc.*, IPR2023-00539, Paper No. 10 at 48-53 (PTAB 2023) (declining to exercise discretion under §325(d) even where the primary references were "cited on the patents' corresponding Information Disclosure Sheets.")

Second, this argument is improperly premised on Patent Owner's contention that the "principal references disclose nothing about how to implement a VPN or VPN tunnel in a web videoconferencing network and thus Petitioners allegedly use VPN Textbook as a "catalog of components" to recreate the alleged invention. But contrary to Patent Owner's allegations, "the principal references" do disclose the implementation of a VPN as the type of network used in a video conferencing

system. *See e.g.*, Knappe (Ex_1006) at 4:58-61 and Elliott (Ex_1007) at 4:30-31, 6:55-57. The VPN Textbook is used in combination with these references in each of Grounds 2 and 4 (addressing challenged claims 5-8) to show that the alleged invention is no more than "a combination of familiar elements according to known methods … [that] does no more than yield predictable results." *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 401 (2007). As the Board noted in connection with its Institution Decision on related U.S. Patent No. 8,339,997 (IPR2023-00371), which shares the same specification as the '525 patent, the VPN Textbook establishes that the "star" topology relied upon in the '525 patent for the claimed virtual private network was "the most common" known method. *See* IPR2023-00371, Paper No. 6, Institution Decision at 14. Thus, contrary to Patent Owner's assertion, the VPN Textbook is appropriately relied upon in Grounds 2 and 4 of the Petition in combination with other references to establish obviousness of the challenged claims 5-8.

2. The Prior Art Renders Obvious the "VPN Tunnel" Limitation of Claims 5 and 7

Sections III.F and III.H of the POR repeat the same argument – using almost identical language – that the prior art does not disclose the "VPN tunnel" limitation of the claims. The POR ignores most of the evidence and prior art relied upon by Petitioners and instead asserts a series of irrelevant, incorrect and disjointed

arguments (most of which are not supported by any evidence in the record). POR at 21-26, 28-32.

The POR first contends, "Petitioner has broken the complete claim element into two parts. The element is 'receiving first audio data, first video data and first collaboration data at a server from a first remote client through a first Virtual Private Network (VPN) tunnel.'" *Id*. at 21-22, 29. But there is no such claim language in claims 5 or 7 (or any of claims 1-8) of the '525 patent. Thus, the argument appears to have been inadvertently included in the POR and has no relevance here.

The POR goes on to argue (with no evidentiary support), that the VPN and VPN tunnel referenced in Elliot "can only be understood as directed to 'network 18,' which is used to connect two computers over the Internet, and not audio data, mixed or otherwise." *Id*. at 22-23, 29-30; *see also id*. at 24 (claiming Elliott's VPN is unrelated to audio communication). Attorney argument carries no evidentiary weight. *In re Schulze*, 346 F.2d at 602. In any event, the POR's characterization of Elliott is incorrect. Elliot expressly discloses securing the transmission of audio data with VPN tunnels. Elliott teaches "multi-media collocation" including "voice, fax, data, video, etc." transmitted over the Internet using a "virtual private network (VPN). . . which uses IP or IP-tunneling." Pet. at 60-61, citing Ex_1007 at 2:66-3:13, 4:6-12, 4:31-34 and Ex_1003 ¶¶ 329-331. The POR contends that Petitioners

fail to distinguish between a VPN and a VPN tunnel (POR at 23), but as discussed above, Elliott explicitly discloses use of tunneling.

Next, the POR asserts that the "VPN tunnel" of claim 5 is not obvious because Elliot does not disclose a "VPN bridge" or a system wherein data is delivered via a VPN tunnel to a moderator where the data is "decrypted" before being shared with the PSTN client. POR at 23, 30. But none of the claims of the '525 patent (including claim 5) requires a "VPN bridge" or decryption of any audio data, let alone decryption of audio data by the moderator before transmission to a PSTN client.

The POR includes one sentence regarding the construction of "VPN" as "a private network of securely connected appliances configured within a public network", claiming that is not shown by the prior art. POR at 24, 30-31. That is certainly not the case. As explained above (and in the Petition), Elliott expressly discloses a VPN and use of IP-tunneling. Pet. at 60-61, citing Ex_1007 at 2:66-3:13, 4:6-12, 4:31-34 and Ex_1003 ¶¶ 329-331.

In addition, the POR ignores the totality of the prior art and evidence relied on by Petitioners. It does not discuss any of the disclosures in the VPN Textbook cited by Petitioners which teaches implementation of VPN tunneling, including implementation of a VPN tunnel in Drell using the hub-and-spoke topology taught by the VPN Textbook, which is the same type of VPN tunnel disclosed in the '525

patent. Pet. at 61, 64-65; Ex_1010 at 130 (annotated); Ex_1003 ¶¶ 334-336, 356-361; *see* Ex_1003 ¶ 108 (explaining "hub-and-spoke" topology disclosed in the VPN Textbook is referred to as star topology (which is discussed at '525 patent at 5:46-48)). Indeed, Dr. Houh explained that before the '525 patent's priority date, implementing VPN tunnels was well-known. He explained that "[t]unneling refers to a networking technique whereby a packet is encapsulated in another network packet, typically so that it can traverse an underlying network that does not support the capability required by the encapsulated packet." Ex_1003 ¶ 99. He explained that such encapsulated IP tunneling was standardized and "described in RFC 1853 which was published in the mid-1990s." *Id*.

The POR does not even address, let alone rebut Petitioners' reliance on this evidence showing that Drell in combination with the VPN tunneling teachings in Elliott and the VPN Textbook render obvious claim 5. Pet. at 60-62, 64-65; Ex_1003 ¶¶ 327-337, 352-362.

Instead, in discussing claim 5 of the '525 patent, without any evidentiary support (expert or otherwise), Section III.F of the POR concocts a strawman hypothetic attempting to distinguish use of conferencing services such as Zoom and Microsoft Teams with a VPN central hub. POR at 25-26. The relevance of this argument to the requirements of the '525 patent (as recited in claim 5 or otherwise) is unclear, however. Petitioners' obviousness grounds do not rely on a

VPN tunnel implementation by multi-party conference call services like Zoom or Microsoft Teams. Rather, Petitioners have shown that it would have been obvious to a POSITA to implement the "VPN tunneling" of claim 5 in Drell's conferencing system based on the disclosures in Elliott and the VPN Textbook. Pet. at 60-62; Ex_1003 ¶¶ 327-337.

3. A POSITA Would Have Been Motivated to Combine the Prior Art

Section III.G of the POR argues that claim 6 is not rendered obvious because (1) there is no motivation to combine Knappe and Voois, and (2) there is no motivation to combine Drell and Knappe. The POR provides no evidentiary support (expert or otherwise) and relies solely on attorney argument. In any event, neither argument shows that claim 6 is non-obvious.

For its first argument, the POR contends that there is no motivation to combine Knappe and Voois because Knappe discloses a centralized conference bridge and manager that encodes and mixes data, while Voois discloses a local device that mixes and encodes received audio and video data. POR at 26-27. But Petitioners do not rely on a combination of Knappe and Voois. Petitioners' Ground 2 is based on a combination of Drell with Knappe and Voois. *See e.g.* Pet. at 4. And Drell, like Voois, discloses a local device with an application that encodes and mixes received data. *See e.g.* Pet. at 25, citing Ex_1008 at 3:4-8; *see also* Pet. at 23-25 (reasons to combine Drell and Voois).

The POR's second argument that there is no motivation to combine Drell and Knappe repeats, almost verbatim in parts, the argument set forth in Sections III.A and III.C of the POR, which Petitioners address above in Section III.A.1 of this Reply. Thus, for the same reasons articulated above in Section III.A.1 of the Reply, a POSITA would have been motivated to combine Drell and Knappe.

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Given that none of the arguments raised by Patent Owner in the POR successfully rebut any of Petitioners' arguments as to claims 1-3, 5-7 of the '525 patent (the only claims addressed in the POR), or the Board's initial determinations as to these claims, all of the challenged claims 1-8, should be finally deemed unpatentable.

IV. CONCLUSION

For the reasons given above and in the Petition, Petitioners have demonstrated a reasonable likelihood of success in establishing the unpatentability of claims 1-8 of the '525 patent and respectfully requests cancellation of claims 1-8.

Respectfully submitted,

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CERTIFICATE OF WORD COUNT PURSUANT TO 37 C.F.R. § 42.24(D)

The undersigned hereby certifies that the word count for the above Reply is 3,784, which is less than the 5,600 allowed under 37 CFR § 42.24(c)(1).

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 12, 2024, a copy of this PETITIONERS' REPLY TO PATENT OWNER RESPONSE and all supporting exhibits were provided via electronic mail (by consent) to the Patent Owner by serving the correspondence address identified in the Mandatory Notices:

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