

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 IPR2023-00380
U.S. Patent No. 9,843,612
(Claims 10-18)

PETITIONERS' REPLY TO PATENT OWNER RESPONSE

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Cases

<i>In re Merck & Co., Inc.</i> , 800 F. 2d 1091 (Fed. Cir. 1986)	3
<i>In re Schulze</i> , 346 F.2d 600 (CCPA 1965)	3, 11

TABLE OF EXHIBITS

Ex.	Description
1001	U.S. Patent No. 9,843,612 (“the ’612 patent”)
1002	Patent Assignments for the ’612 patent
1003	Declaration of Dr. Henry H. Houh
1004	<i>Curriculum Vitae</i> for Dr. Henry H. Houh
1005	File History of Application No. 14/984,709 (the ’709 application)
1006	U.S. Patent No. 7,180,997 (“Knappe”)
1007	U.S. Patent No. 6,690,654 (“Elliott”)
1008	U.S. Patent No. 7,089,285 (“Drell”)
1010	Guichard <i>et al.</i> , “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 <i>et al.</i> , “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
1027	Computer Desktop Encyclopedia
1033	H.323 Standard
1034	US Patent No. 7,266,091
1035	US Patent No. 5,606,550
1039	US 6,798,753 (“Doganata”)
1040	WO2001018665 (“Hendricks”)
1041	U.S. Patent No. 6,768,914
1042	U.S. Patent No. 6,501,740
1043	U.S. Patent No. 6,424,647
1044	U.S. Patent No. 6,961,416
1046	Declaration of C.J. Alice Chuang
1038	Declaration of Caroline Chang
1039	Declaration of Ryan Marton

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 in many instances addresses claim limitation that are not included in the challenged claims and 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, and lack support from or citations to the record.

As a preliminary matter, Petitioners address two irrelevant disputes raised in the POR that lack any substance.

First, in the POR, Patent Owner disagrees with the level of ordinary skill in the art proposed in the Petition, requiring three years of experience relating to conferencing systems in packet-based networks, “because it is too specialized.” POR at 10-11. Instead, the Patent Owner proposes that a person of ordinary skill in the art (“POSITA”) would have **no** relevant experience in the field of the alleged invention but rather generically in “computer systems development.” *Id.* The ’612 patent 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 1:21-23. Indeed, the Board agreed that Petitioners’ proposed level skill in the art because “it is consistent with ... the asserted prior art and ’612 patent specification.” Institution Decision at 8. In addition, not only is Patent Owner’s proposal clearly wrong but this alleged dispute is actually irrelevant since none of the arguments in the POR rest on this alleged difference of the proper experience a POSITA must have. Having a few years of work experience in the actual field of the invention is not “too specialized” a requirement for a POSITA but under either definition the result is the same: the challenged claims are unpatentable.

Second, in the POR, Patent Owner 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.* However, only a handful of the listed terms actually appear in the claims of the ’612 patent. Moreover, the subsequent Patent Owner arguments do not actually rely on any of these claim 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.

II. RESPONSE TO PATENT OWNER ARGUMENTS

In response to the Petitioners' grounds of rejection and the Board's institution decision, the POR largely presents unsupported attorney argument with few citations to the record and virtually no support from the inventor declaration. But 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 (Fed. Cir. 1986). Thus, the Patent Owner's arguments fail to overcome the Board's findings that claims 10-18 are unpatentable.

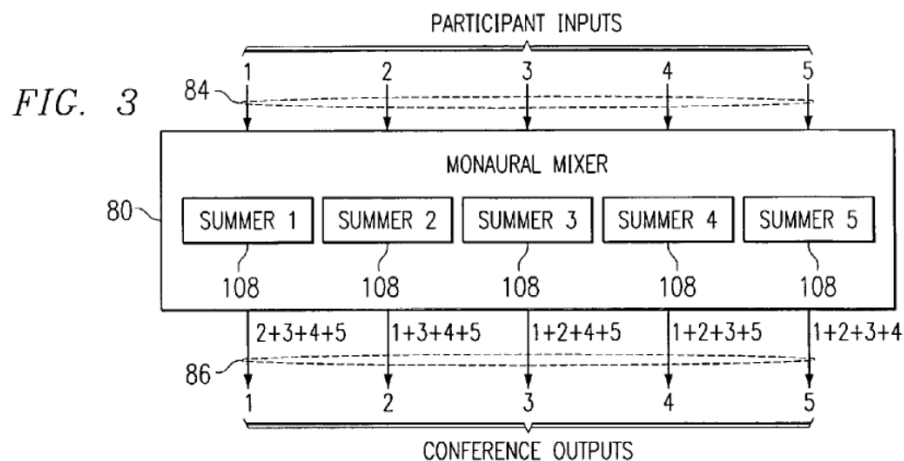
A. Ground 1: Claims 10-18 Are Obvious Over Drell in Combination With Knappe, Elliott, Hendricks, and Doganata

With respect to Ground 1, in the POR, Patent Owner asserts repetitive and irrelevant arguments often misrepresenting the claim limitations at issue in this Petition, the actual combinations of prior art relied on by Petitioners and the disclosures in the prior art. Petitioners address the arguments in the order raised.

1. The Prior Art of Record Does Disclose The “Transmitting” Elements of Claim 10

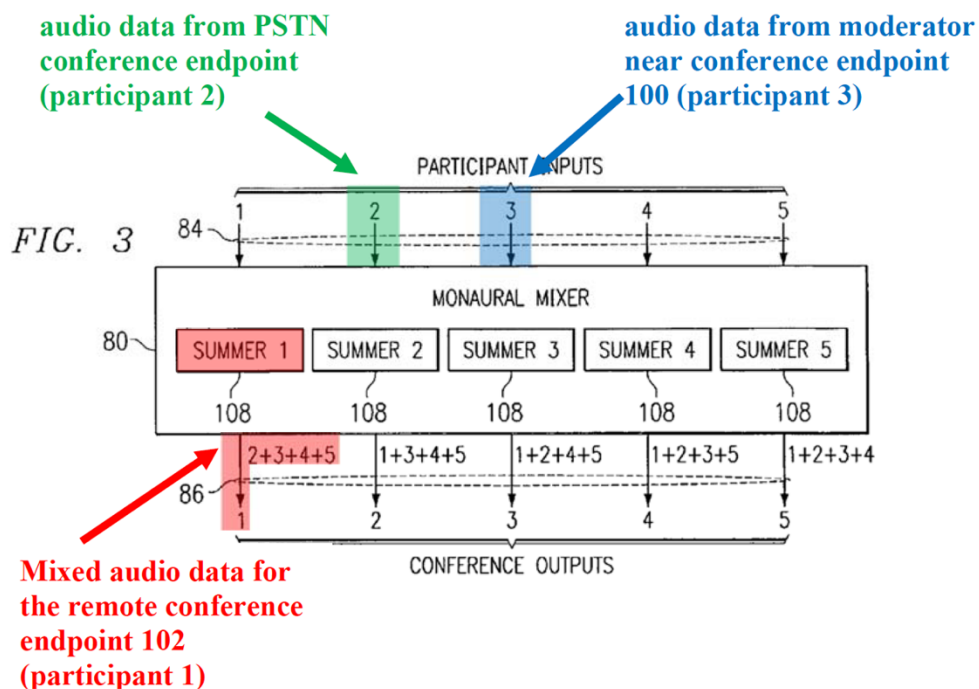
Patent Owner’s assertion in section A of the POR that the prior art references relied on in the Petition fail to disclose “mixing of different audio streams comprising different input signals for different recipients” is irrelevant and inaccurate. POR at 15-16. It’s irrelevant because the claims of the ’612 patent do not require mixing of “audio streams.” In fact, claim 10 of ’612 patent does not require any “audio stream.” That said, to the extent Meetrix is referring to the requirement that certain “audio data” is transmitted to the “remote client” [limitation 10.4.1] and different “audio data” is transmitted to the “PSTN client” [limitation 10.5], the references in the Petition expressly disclose such limitations.

For the requirement that different audio data be sent from the moderator to the “remote” client compared to the mixed audio data being sent from the moderator to the “PSTN” client, Petitioners rely on Knappe’s disclosure of mixing separate audio data for transmission to different clients. *See* Petition at 43-49, 50-52. As explained in the Petition, Knappe teaches using a mixer 80 with a plurality of summers (e.g., summers 1 to 5), where each summer mixes audio data from the other participants (e.g., participants 1 to 5):



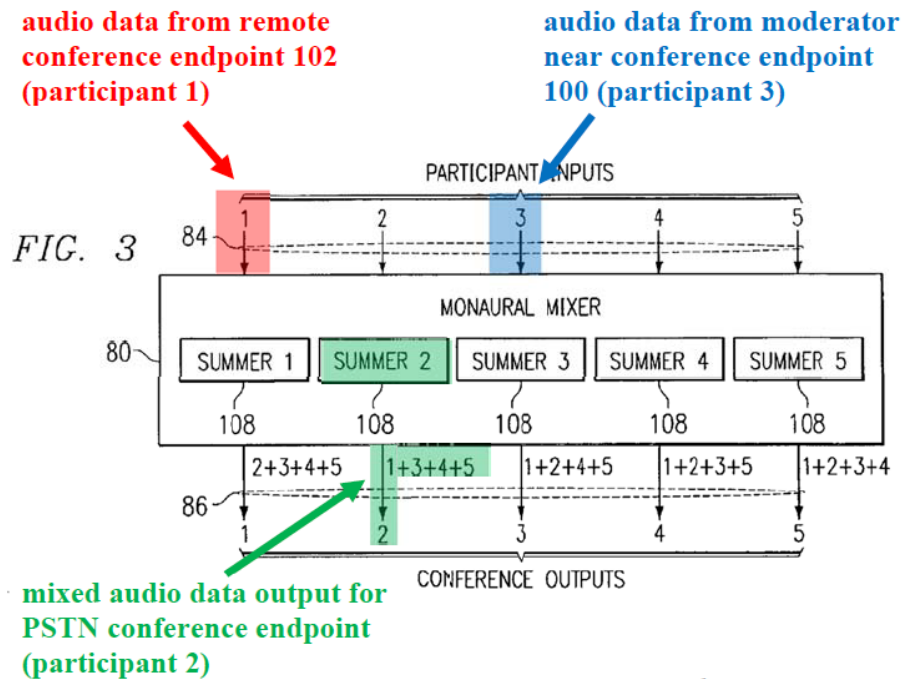
Ex_1006, FIG. 3; *see also id.*, 6:59-63 (“mixer 80 receives participant input streams 84 and combines the streams in summers 82 to generate conference output streams 86 for *each* participant”); Ex_1003 ¶243. As explained in the Petition, it would have been obvious to a POSITA to use a plurality of summers (as Knappe teaches) in audio mixing module 308 of Drell’s MP conferencing. Petition at 45-48; Ex_1003 ¶244. Using a plurality of summers (one for each participant) would provide for separately mixing audio data from the different endpoints to obtain the functionality of generating a separate mix for each participant, which is consistent with Drell’s desire to generate a separate instance for each remote endpoint. *See* Ex_1008, 6:66-7:4; Ex_1003 ¶245; *see also* Petition at 43-49.

For example, below is an annotated Figure 3 from Knappe showing the mixing of audio data from the PSTN client and audio data from moderator (which constitutes “third audio data”) for transmission to the remote client as is required by limitation 10.4.1:



Ex_1006, FIG. 3 (annotated); Ex_1003 ¶246.

Similarly, the combination of art in Ground 1 discloses limitation 10.5's requirement of transmitting "fourth audio data" (a mix of audio data from the remote client and audio data from the moderator) to the PSTN client. Petition at 50-52. To illustrate, below is an annotated example of Knappe's Figure 3 showing mixing of audio data from remote conference endpoint 102 with audio data from the moderator near conference endpoint 100 into mixed audio data for the PSTN conference endpoint:



Ex_1006, FIG. 3 (annotated); Ex_1003 ¶269. In the combination of Drell and Knappe, the mixed audio data output by the audio mixing module 308, for the PSTN conference endpoint, corresponds to a “*fourth audio data*,” since it is a mix of locally generated audio from the moderator and the audio from the remote conference endpoint 102. *Id.* ¶270.

Thus, the prior art teaches that the moderator near conference endpoint 100 transmits mixed audio data (mixed specifically for the PSTN conference endpoint) to the PSTN conference endpoint through a gateway, which renders obvious “*transmitting fourth audio data from the local moderator client to the PSTN client through the PSTN gateway*,” as claimed. *Id.* ¶¶264-275.

2. The Arguments in Section B of POR Are Irrelevant

In section B of the POR, Patent Owner argues that Petitioners rely on Knappe being combined with Elliot but that one skilled in the art would not be motivated to combine these references. POR at 17. While Petitioners disagree with the assertion that a POSITA would not be motivated to combine Knappe with Elliot, it need not address the argument given that the Petition does not rely on a combination of Elliot with Knappe. Instead, Elliot is combined with Drell (the primary reference) to establish that the VPN tunnel limitation (limitation 10.4.2) is obvious. Petition at 49-50.

3. The VPN Tunnel Limitations Are Obvious

In section C of the POR¹, Patent Owner asserts a series of irrelevant, incorrect and disjointed arguments (most of which are not supported by any evidence in the record) apparently in effort to assert the prior art does not disclose the “VPN tunnel” limitations of claim 10 (limitations 10.3.2 and 10.4.2). POR at 17-21.

Patent Owner 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

¹ The heading of POR section C refers to claim 19 but claim 19 is not at issue in this Petition. Presumably, Patent Owner meant to refer to claim 10 and Petitioners will assume it did.

Virtual Private Network (VPN) tunnel.’” POR at 18. But there is no such claim limitation in the ’612 patent. The closest limitations are 10.3.1 and 10.3.2 which together recite “receiving ~~third~~ second audio data at the local moderator client ~~first~~ ~~video data and first collaboration data at a server~~ from a ~~first~~ remote client through a first Virtual Private Network (VPN) tunnel.” Ex_1001, 10:57-59 [reflecting differences between actual claim language and the language that Patent Owner contends is the element]. Nonetheless, for the remaining arguments, Petitioners will assume Patent Owner’s inaccurate assertion regarding the claim language is a typographical error, and Patent Owner meant to contend that the Petitioners have not shown the prior art of record discloses limitations 10.3.1 and 10.3.2 (and potentially limitation 10.4.2 which also refers to a VPN tunnel).

Patent Owner next argues because Knappe “does not disclose communication using VPN tunnel” Petitioners have “combined Elliot (Ex_1007) with Knappe” and a POSITA would not be motivated to make such a combination. POR at 18-19. Patent Owner’s contention that a POSITA would not combine Elliot with Knappe is based on a misrepresentation regarding Elliot’s scope. Patent Owner contends that Elliot is limited to one-to-one interactions and would not apply to a multipoint conferencing system like Knappe’s. However, Elliott does not pertain solely to isolated one-to-one interactions. Indeed, Elliott explicitly states that its system “also enables services for one-to-many and many-to-many IP-

based collaboration[.]” Ex_1007 at 2:10-13; *see also id.* at 7:58-61 (discussing “multiple 1:1, 1:n, n:1, and n:n sessions”). Thus, the Patent Owner bases its argument on a false premise.

Moreover, Patent Owner misconstrues the actual obviousness combination Petitioners rely on for the “VPN tunnel” limitations of the ’612 patent. Petitioners does not rely on Knappe in combination with Elliot for these limitations. Instead, as explained above, Petitioners rely on Drell in combination with Elliot to show that a POSITA would be motivated to and know how to implement well known VPN tunneling techniques within Drell’s conferencing system. Patent Owner does not address this combination. Instead, Patent Owner again argues that nothing in Elliot “would suggest to a person or [sic] ordinary skill in the art that VPN tunnel should or could be implemented to protect voice over the Elliot POTS phone connection or access to a publicly-available URL on the Web.” POR at 19. But, there is no requirement in any of the ’612 patent claims that a VPN or VPN tunnel be used to secure a publicly-available URL or a direct PSTN connection.

Next, Patent Owner again asserts that due to differences between the conference systems in Elliot and Knappe, a POSITA would not be motivated to combine Elliot and Knappe. POR at 19-20. But, again, Petitioners do not rely on a combination of Knappe with Elliot in this Petition.

Next, Patent Owner argues (with no evidentiary support), that the VPN and VPN tunnel referenced in Elliot “is never contemplated for audio.” POR at 20. Patent Owner’s attorney argument carries no evidentiary weight. *In re Schulze*, 346 F.2d at 602 (“[a]rgument in the brief does not take the place of evidence in the record”). But even if Patent Owner’s argument did carry weight, it’s wrong. In fact, Elliot expressly discloses securing the transmission of audio data with VPN tunnels. Elliot discloses a conferencing system that allows for multi-media collaboration between multiple remote participants, including Internet-based and PSTN clients. Ex_1007, Abstract & FIG. 1. Elliott teaches “collaborative Web browsing, audio conferencing, video conferencing, and application sharing.” Ex_1007, 1:40-44; Ex_1003 ¶133. Elliott further teaches the use of “a virtual private network (VPN) ... which uses IP or IP-tunneling” for the transmission of “voice, fax, data, video” and “[o]ther types of collaboration ... data” during the conference. Ex_1007, 2:66-3:1, 4:29-34, 6:53-54; Ex_1003 ¶133.

Figure 1 of Elliott shows a “session server 12 [that] is a conference server that follows the ITU T.120 standard” which “contains a series of communication and application protocols and services that provide support for real-time, multi-point data communications.” Ex_1007, FIG. 1, 5:49-54.

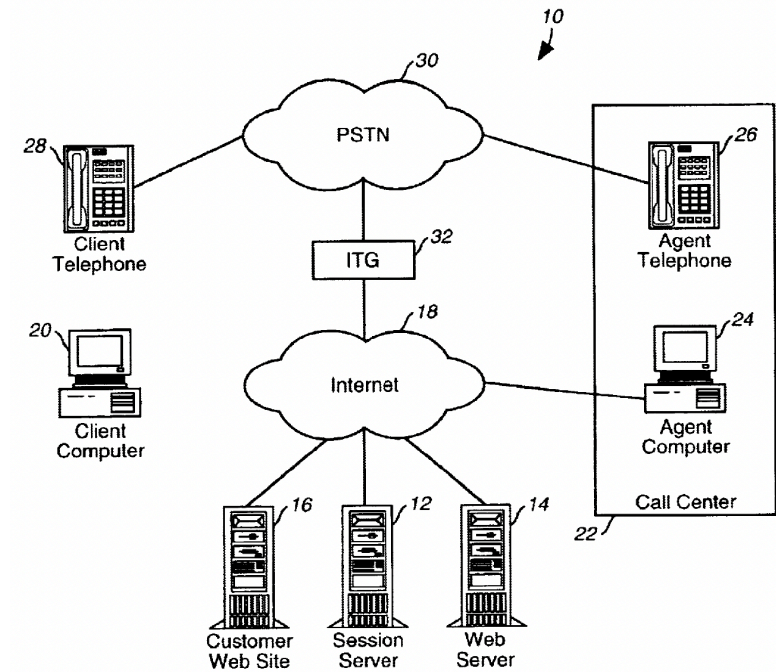


FIG. 1

Id., FIG. 1. “[N]etwork 18 can be either a public or a carrier supported virtual private network (VPN) or local area network (LAN) which uses IP or IP-tunneling. Ex_1007, 4:28-32. This network allows for secure transmission of audio data via a VPN tunnel. Ex_1003 ¶¶ 234-236.

Next, Patent Owner argues that the VPN tunnel limitations are not obvious because Elliot does not disclose 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 20-21. But claim 10 of the ’612 patent does not require decryption of any audio data let alone decryption of audio data by the moderator before transmission to a PSTN client.

Next, Patent Owner asserts (without any evidentiary support) the VPN tunnel limitations of claim 1 are not obvious because none of the prior discloses use of a “VPN bridge.” POR at 21. But no claim of the ’612 patent requires a VPN bridge.

Next, Patent Owner again argues that Elliot does not support a finding of obviousness because Elliot’s reference to a VPN is “unrelated to audio communication.” As explained above, Elliot expressly discloses communication of audio data via a VPN.

Finally, Patent Owner argues that the prior art of record does not disclose a VPN tunnel as was construed by the District Court (“a private network of securely connected appliances configured within a public network”). POR at 21-22. But as explained above Elliot expressly discloses a VPN tunnel. Ex_1007, 4:28-32; (“[N]etwork 18 can be either a public or a carrier supported virtual private network (VPN) or local area network (LAN) which uses IP or IP-tunneling.”). Moreover, Dr. Houh explained that before the ’612 patent’s priority date, it was well known to implement VPN tunnels. Ex_1003 ¶¶ 83-84. 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 ¶ 83. He explained that such encapsulated IP tunneling was standardized and “described in

RFC 1853 which was published in the mid-1990s.” *Id.* He further explained encapsulated packet tunneling was implemented and standard in both MBone and IPSec – both of which were common network security approaches in the 1990’s. Ex_1003, ¶¶ 84-90. A POSITA, with knowledge of these standard tunneling approaches, would have known to implement VPN tunneling disclosed in Elliot in Drell’s conferencing system. Ex_1003, ¶¶ 166-172, 231-238, 258-263.

4. There is No “Second VPN Tunnel” Limitation

In the heading of section D of the POR, Patent Owner asserts that none of the prior art of record discloses the “Second VPN Tunnel Limitation of Independent Claim 19.” POR at 22. However, claim 19 is not at issue in this Petition.

Notwithstanding the title, Patent Owner goes on in section D of the POR to repeat several of the arguments it made in section C of the POR. First, Patent Owner again argues that the VPN tunnel limitations are not obvious because Elliot does not disclose 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 22. But claim 10 of the ’612 patent does not require decryption of any audio data let alone decryption of audio data by the moderator before transmission to a PSTN client.

Next, Patent Owner asserts (without any evidentiary support) the VPN tunnel limitations of claim 1 are not obvious because none of the prior art discloses use of a “VPN bridge.” POR at 22. But no claim of the ’612 patent requires a VPN bridge.

Finally, Patent Owner argues it is “crucial to distinguish between a VPN and VPN Tunnel.” POR at 23. While Patent Owner does not explain in this section why it is crucial to make such distinction, presumably Patent Owner is again arguing that the prior art of record does not render the VPN tunnel limitations obvious. But as explained above Elliot expressly discloses a VPN tunnel. Ex_1007, 4:28-32; (“[N]etwork 18 can be either a public or a carrier supported virtual private network (VPN) or local area network (LAN) which uses IP or IP-tunneling.”).

5. Sections E of The POR Is Irrelevant and Repetitive

In the heading of Section E of the POR, Patent Owner asserts the prior art of record does not disclose the “‘Mixing the First Audio Data With the Second Audio Data Into a First Mixed Audio Data’ Limitation of Independent Claim 19.” POR at 23. But claim 19 is not at issue in this Petition and there is no mixing of “first” and “second” audio data limitation in any of the claims at issue in this Petition.

In section E of POR, Patent Owner then proceeds to repeat the arguments from section D of the POR, regarding combining Elliot and Knappe, decryption of

audio data, and the VPN bridge. For the reasons recited above, these arguments all fail.

6. Sections F of The POR Is Irrelevant and Repetitive

In the heading of Section F of the POR, Patent Owner asserts the prior art of record does not disclose the “Mixing the First Audio Data With the Third Audio Data Into a Third Mixed Audio Data’ Limitation of Independent Claim 19.” POR at 23. But claim 19 is not at issue in this Petition and there is no mixing of “first” and “third” audio data limitation in any of the claims at issue in this Petition.

In section F of POR, Patent Owner then proceeds to repeat the arguments from section D of the POR, regarding combining Elliot and Knappe, VPN tunnels, decryption of audio data and the VPN bridge. For the reasons recited above, these arguments all fail.

7. The Prior Art Discloses “Collaboration Data”

Despite the title of Section G of the POR (which refers to a limitation from claim 19 which is not at issue in this petition), Patent Owner argues in Section G that the prior art does not disclose “collaboration data” (which is included in limitation 10.4.1). POR at 26-27. Patent Owner first incorrectly argues that Petitioners rely on Knappe and Elliot for “collaboration data.” POR at 26. But Petitioners do not rely on Knappe for this element. Instead, Petitioners rely on Drell for collaboration data – which does disclose it. Drell teaches that “still

images [are] received from or transmitted to remote conference endpoints 102 and 014.” Ex_1008, 6:53-56. The “still images” received from remote conference endpoint 104 which near conference endpoint 100 then transmits to the remote conference endpoint 102, correspond to “*first collaboration data*,” as claimed. Ex_1003 ¶252. Drell also teaches that its “communication process...may for example comprise an...H.323 (packet-based) process.” Ex_1008, 2:26-33. A POSITA would understand that an H.323 process also discloses “*first collaboration data*,” because H.323 was a well-known standard that recommended T.120 collaboration data. Ex_1003 ¶253. Indeed, the ’612 patent itself relies on the prior art H.323/T.120 standards for transmitting collaboration data as part of the packetizing process. Ex_1001, 3:19-21 (“[T]he H.323 recommendation defines a data collaboration capability as known and outlined in the T.120 data collaboration unit.”), FIG. 2 (Prior Art).

In addition, Elliott teaches collaboration data, such as “application sharing” data, “web browsing” data, and collaboration data per the “T.120 standard.” Ex_1007, 1:40-44, 5:49-61, 6:46-54, 11:6-13. Any one of Elliott’s types of collaboration data (such as application sharing, web browsing, and other collaboration data per the T.120 standard) corresponds with “*first collaboration data*,” as claimed. Ex_1003 ¶¶254-255. It would have been obvious to a POSITA for the moderator near conferencing endpoint 100 in Drell to transmit collaboration

data (e.g., application data, web browsing data, and other collaboration data per the T.120 standard) as Elliott teaches, to the remote conference endpoint 102, because including collaboration data in transmissions to other conference endpoints would allow different ways for the participants to collaborate thereby enhancing the effectiveness of the collaboration among the participants. *Id.* ¶256; *see also id.* ¶¶158-172.

Given that none of the arguments raised by Patent Owner in the POR successfully rebut any of Petitioners' arguments as to claims 10-18 of the '612 patent, or the Board's initial determinations as to these claims, all of the challenged claims 10-18, should be finally deemed unpatentable.

III. CONCLUSION

For the reasons given above, Petitioners have demonstrated the unpatentability of claims 10-18 of the '612 patent.

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 3,562, 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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