UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YEALINK (USA) NETWORK TECHNOLOGY CO., LTD., AND YEALINK NETWORK TECHNOLOGY CO., LTD.,

Petitioners,

v.

BARCO N.V.

Patent Owner.

CASE: IPR2024-01436

U.S. PATENT NO. 10,762,002

MOTION TO SEAL

Exhibit List

Exhibit	Description
Ex. 2001	Reserved
Ex. 2002	Reserved
Ex. 2003	Reserved
Ex. 2004	Declaration of Dr. Michael Brogioli
Ex. 2005	Curriculum Vitae of Dr. Michael Brogioli
Ex. 2006	June 30, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01436
Ex. 2007	July 1, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01439
Ex. 2008	July 2, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01437
Ex. 2009	July 2, 2025 Deposition Transcript of Kevin C. Almeroth IPR2024-01438
Ex. 2010	Barco Sales Data *(Confidential and Redacted Versions Filed)*
Ex. 2011	Crestron License Agreement *(Confidential and Redacted Versions Filed)*
Ex. 2012	*Barco and Crestron announce patent license agreement regarding a set of essential ClickShare patents*, BARCO (Sept. 12, 2023) https://web.archive.org/web/20240810204702/https://www.barco.com/en/about/press-releases/barco-and-crestron-announce-patent-license-agreement-regarding-a
Ex. 2013	*ClickShare conferencing & collaboration,* BARCO (April 1, 2025), https://web.archive.org/web/20250401012647/https://www.barco.com/en/products/clickshare-conferencing-collaboration#expand
Ex. 2014	*ClickShare Button*, BARCO (February 12, 2025)

Exhibit	Description
	https://web.archive.org/web/20250212164931/https://www.barco.com/en/product/clickshare-conferencing-button
Ex. 2015	ECF 65, Joint Claim Construction and Prehearing Statement, *Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al,* 2:2023-cv-521 (E.D. Tex. 11/14/2023)
Ex. 2016	ECF 89, Claim Construction Order, *Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al,* 2:2023-cv-521 (E.D. Tex. 11/14/2023)
Ex. 2017	List of Products Covered by Barco Patents accessible at: https://www.barco.com/en/about/terms-conditions/patents
Ex. 2018	*Patent*, CRESTRON (June 12, 2025) https://www.crestron.com/legal/patents?page=1
Ex. 2019	Crestron Electronics | Private Company Profile, PITCHBOOK
Ex. 2020	ECF 55, Consent Judgment and Permanent Injunction, *Barco, Inc. et al v. Vivitek Corporation et al*, Case No. 4:19-cv-3250 (N.D. Cal. 4/27/2020)
Ex. 2021	*Barco Successfully enforces ClickShare IP against competitors in the U.S.*, BARCO (May 26, 2020) https://web.archive.org/web/20240424230846/https://www.barco.com/en/about/press-releases/2020-05-26-barco-successfully-enforces-cs-ip-against-competitors-in-the-us
Ex. 2022	Paul Krzyzanowski, *Devices*, PK.ORG (updated March 24, 2011).
Ex. 2023	Excerpts from April 18, 2025 Deposition Transcript of Andrew Ludke *(Confidential and Redacted Versions Filed)*
Ex. 2024	*USB device class drivers included in Windows*, Microsoft (Apr. 9, 2025) https://web.archive.org/web/20250409210411/https://learn.microsoft.com/en-us/windows-hardware/drivers/usbcon/supported-usb-classes

Exhibit	Description
Ex. 2025	Reserved
Ex. 2026	Dr. Kevin Almeroth's Declaration in IPR2024-01437
Ex. 2027	Dr. Kevin Almeroth's Declaration in IPR2024-01438
Ex. 2028	Reserved
Ex. 2029	Reserved
Ex. 2030	Dr. Kevin Almeroth's Declaration in IPR2025-00597
Ex. 2031	Reserved
Ex. 2032	Modified Protective Order
Ex. 2033	December 1, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01436, IPR2024-01437, IPR2024-01438 and IPR2024-01439
Ex. 2034	Patent Owner's Demonstrative *(Confidential and Redacted Versions Filed)*

I. Introduction

Patent Owner requests that Patent Owner's Demonstrative (Ex. 2034) is sealed under 37 C.F.R. § 42.54. Good cause exists to seal Patent Owner's Demonstrative because it contains sensitive, nonpublic information. A redacted version of Exhibit 2034 is being filed herewith.

Patent Owner certifies that it has conferred with Petitioner through counsel, and Petitioner stated they reserve the right to oppose.

II. Good Cause

In deciding whether to seal documents, the Board must find "good cause," and must "strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." *Garmin v. Cuozzo*, IPR2012-00001, Paper 36 (PTAB Apr. 5, 2013). Good cause for sealing material established by demonstrating that the balance of the following considerations favors sealing the material: whether (1) the information sought to be sealed is truly confidential, (2) a concrete harm would result upon public disclosure, (3) there exists a genuine need to rely in the trial on the specific information sought to be sealed, and (4), on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record. *See Argentum Pharms. LLC v. Alcon Research, Ltd.*, IPR2017-01053, Paper 27 at 4

(PTAB Jan. 19, 2018) (informative); *see also Corning Optical Communications RF, LLC, v. PPC Broadband, Inc.*, IPR2014-00440, Paper 47 at 3 (PTAB Apr. 14, 2015).

Exhibit 2034 cites and quotes confidential information in Exhibits 2010–2011 and 2023 which have already been sealed in this Proceeding. The balance of the *Argentum* factors favors sealing the documents at issue. Addressing the *Argentum* factors in turn:

First, the information Patent Owner seeks to seal is truly confidential. The Trial Practice Guide provides that "the rules aim to strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." 77 Fed. Reg. 48756, 48760 (Aug. 14, 2012). Further, those rules "identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information." *Id*. (citing 37 C.F.R. § 42.54).

The information sought to be sealed relates to confidential financial information of Patent Owner. This information includes pricing, costs, profits, licensing, and other terms that impact profitability and business decisions. The information also includes highly confidential business practices information of Patent Owner and a third party, including confidential and sensitive information relating to licensing dealings between Patent Owner and third party. This

information is subject to confidentiality provisions of the agreement itself, as well as is treated as confidential by Patent Owner in its regular business operations.

Accordingly, the unredacted version of the exhibits were marked as HIGHLY CONFIDENTIAL –ATTORNEYS' EYES ONLY in this proceeding pursuant to an agreement between the parties. Neither Patent Owner, nor the third party have made nor do they intend to make, this information publicly available.

Second, Patent Owner and the third-party would suffer several concrete harms from the public disclosure of the confidential information sought to be sealed. The confidential information details sensitive financial terms, including licensing terms, and sales and pricing information, public access to this information would give Patent Owner's competitors and would-be rivals unfair competitive advantages, including an otherwise unavailable insight into Patent Owner's pricing and profitability as well as licensing terms, which would place the third party and Patent Owner and third party at a disadvantage in future negotiations.

Third, there exists a genuine need to rely in the trial on the specific information sought to be sealed. License agreements and financial information such as those submitted herewith are the type of subject matter for which motions to seal are regularly granted. *See Beckman Coulter, Inc. at Sirigen II Ltd*., IPR2022-01206, Paper 62 at *72-74 (PTAB Dec. 21, 2023) (granting motion to seal "financial or competitive information belonging to a third party" and a "license agreement that

contain highly sensitive financial competitive information and that the third party agreed to Patent Owner's use of these documents on the condition they be designed" under protective order.). Moreover, Patent Owner submits that there is a genuine need to rely on the information sought to be sealed to establish that Patent Owner's products practice the claims that Petitioner has challenged in this IPR proceeding, that those products are commercially successful, and to evidence additional secondary indicia of nonobviousness.

Fourth, on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record. The public interest is well-served in keeping business information readily available and exchangeable between parties without the fear of incidental public exposure of confidential business information. By contrast, the public interest in having access to the confidential information in the documents sought to be sealed is minimal. Moreover, the sealing of this information will have minimal, if any impact at all, on the public's ability to following he proceeding.

III. Conclusion

For the above reasons, Patent Owner requests that the Board seal and protect the Patent Owner and Third-party confidential information contained in Exhibit 2034.

Respectfully submitted,

Dated: January 16, 2026

By: /*Erik Halverson*/

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2026, I caused a true and correct copy of the foregoing to be served on the following counsel of record for Petitioners by electronic mail to the following addresses:

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