

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

U.S. Patent No. 10,762,002
IPR2024-01436

PETITIONER'S REPLY

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TABLE OF EXHIBITS

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Ex-1001	U.S. Patent No. 10,762,002
Ex-1002	Declaration of Kevin C. Almeroth, Ph.D.
Ex-1003	Curriculum Vitae of Kevin C. Almeroth, Ph.D.
Ex-1004	File History of U.S. Patent No. 10,762,002
Ex-1005	U.S. Patent Application Publication No. 2005/0210390 (“Ono”)
Ex-1006	U.S. Patent Application Publication No. 2008/0074560 (“Ichieda”)
Ex-1007	U.S. Patent Application Publication No. 2006/0069840 (“Corbett”)
Ex-1008	RESERVED
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Ex-1012	RESERVED
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Ex-1014	International Patent Application Publication No. 2006/113711 (“Ahmed”)
Ex-1015–Ex-1019	RESERVED
Ex-1020	U.S. Patent Application Publication No. 2010/0087139 (“Glass”)
Ex-1021	U.S. Patent Application Publication No. 2009/0198839 (“Banerjee”)
Ex-1022	U.S. Patent Application Publication No. 2011/0115689 (“Sugiyama”)
Ex-1023	U.S. Patent Application Publication No. 2009/0187687 (Hulbert”)

EXHIBIT	DESCRIPTION
Ex-1024	U.S. Patent Application Publication No. 2003/0112975 (“Taiwanese”)
Ex-1025	RESERVED
Ex-1026	U.S. Patent Application Publication No. 2009/0172219 (“Mardiks”)
Ex-1027	U.S. Patent Application Publication No. 2010/0295994 (“Kaplan”)
Ex-1028	RESERVED
Ex-1029	RESERVED
Ex-1030	EP Patent Application Publication No. 2107463 (“Deforche”)
Ex-1031	JP Patent Application Publication No. 2007-208606 (“Maeda”)
Ex-1033	U.S. Patent Application Publication No. 2002/0196378 (“Slobodin”)
Ex-1034	U.S. Patent Application Publication No. 2002/0174254 (“Kita”)
Ex-1035–Ex-1049	RESERVED
Ex-1050	Imation Wireless Projection Link User Guide
Ex-1051	EZAir Press Release, “EZAir Wireless PC to TV Solutions Now Available Across Europe,” March 16, 2011
Ex-1052	Warpia Product Brief, “Wireless USB PC to TV Audio/Video Display Adapter,” 2009
Ex-1053	Q-Waves Product Overview, “Quicklink TV,” November 2010
Ex-1054	IOGear Installation Guide, “Wireless USB to VGA Kit,” 2008
Ex-1055	JP Patent Application Publication No. 2007-208606
Ex-1056	Certification for English Translation of JP Patent Application Publication No. 2007-208606
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Ex-1059	U.S. Patent Application Publication No. 2006/0229100 (“Born”)
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Ex-1061	U.S. Patent Application Publication No. 2007/0123251 (“McElvaney”)
Ex-1062	U.S. Patent Application Publication No. 2003/0036406 (“Huang”)
Ex-1063	U.S. Patent No. 5,913,174 (“Casarez”)
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Ex-1066	RESERVED
Ex-1067	Clickshare CSE-200 base unit firmware
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Ex-1069	CSE-800 User Guide
Ex-1070	Brogioli '002 depo transcript
Ex-1071	Brogioli '237 depo transcript
Ex-1072	Brogioli '676 depo transcript
Ex-1073	Brogioli '951 depo transcript
Ex-1074	What is a driver? (https://learn.microsoft.com/en-us/windows-hardware/drivers/gettingstarted/what-is-a-driver-)
Ex-1075	ClickShare Button connection issues
Ex-1076	ClickShare C-5 Base Unit Datasheet
Ex-1077	https://www.barco.com/en/inspiration/news-insights/2019-05-03-different-ways-to-share-your-content-with-clickshare (retrieved September 24, 2025).
Ex-1078	Erwin Six depo. transcript

EXHIBIT	DESCRIPTION
Ex-1079	Barco Driver Version Installed 18-7-2025 (https://www.barco.com/en/support/knowledge-base/12770-clickshare-windows-driver-version-installed)
Ex-1080	“Why is ClickShare Windows Driver required and how can I install/update it on my PC?” (https://www.barco.com/en/support/knowledge-base/5676-clickshare-windows-driver-requirements-and-installation)
Ex-1081	Minidrivers, Miniport drivers, and driver pairs (https://learn.microsoft.com/en-us/windows-hardware/drivers/gettingstarted/minidrivers-and-driver-pairs)
Ex-1082	Yealink Press Release (https://www.yealink.com/en/product-detail/wireless-presentation-wpp30-eol)
Ex-1083	Second Declaration of Declaration of Kevin C. Almeroth, Ph.D.
Ex-1084	Dr. Brogioli Dist. Ct. Transcript
Ex-1085	USB Audio Class System Driver (Usbaudio.sys) (https://learn.microsoft.com/en-us/windows-hardware/drivers/audio/usb-audio-class-system-driver--usbaudio-sys-)
Ex-1086	RESERVED
Ex-1087	U.S. Patent No. 11,403,237
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Ex-1090	Deposition transcript of Andrew Ludke, Crestron
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I. INTRODUCTION

The Patent Owner Response (Paper 20, “POR”) conflicts with testimony from Dr. Brogioli that the prior art expressly teaches claim limitations the POR argued are novel. Ex-1072, 72:13-73:13 (Dr. Brogioli admitting that Deforche teaches the “*setting up*” limitation.). The POR also applies an unduly rigid test for motivation to combine, ignoring the Supreme Court’s guidance in *KSR Int’l Co. v. Teleflex Inc.*, 127 S.Ct. 1727, 1741 (2007). The prior art of screen sharing technology is dense, and Barco’s patents simply combine known elements in obvious ways as described in the Petition and discussed further in this reply.

The agreed level of skill in the art in this proceeding is high, which means that the POSA would have a higher likelihood of seeing that the combination of known elements would achieve predictable results relative to a POSA of lesser skill. The Petition demonstrated how “the prior art as a whole suggested the desirability of the combination ..., thus providing a motivation to combine, which need not be supported by a finding that the prior art suggested that the combination claimed by the applicant was the preferred, or most desirable combination over the other alternatives.” MPEP 2143.01., § I. Moreover, as explained further below, the prior art provided suggestions and motivations for altering related prior art references to teach predictable results.

II. BARCO'S CONCERNS WITH DR. ALMEROOTH'S TESTIMONY SHOULD NOT BE AFFORDED WEIGHT.

Barco selectively references Dr. Almeroth's testimony from his seven declarations and four depositions to suggest inconsistency. For instance, Barco highlights Dr. Almeroth's statement that "data is data." POR, 14, citing Ex-2006 (transcript from IPR2024-01436). It is universally accepted that all data in general-purpose computers comprises binary values—1's and 0's—and that such data is transmitted and received over various interfaces, including USB, independent of data type. Dr. Almeroth's testimony was limited to this foundational concept and does not reflect any deficiency in his expertise.

In a separate proceeding addressing an unrelated issue, Dr. Almeroth testified regarding prior art that teaches transcoding data "based on a type of functional data." *Id.*, citing Ex. 2030, ¶¶212-213. This illustrates the routine nature of encoding and decoding audio and video data with different codecs. That testimony is not pertinent to Dr. Almeroth's "data is data" comment, aside from reaffirming that all digital data consists of 1's and 0's transferable across any general-purpose computer interface, such as USB. Additionally, Barco asserts that Dr. Almeroth lacks clarity regarding the definition of "driver," noting that he provided a specific definition for this proceeding. There is no inconsistency in this position, as the term "driver" can have varied meanings depending on context.

Furthermore, Barco devotes over five pages to disputing Dr. Almeroth's well-supported opinion that implementation details represent design choices, claiming unreliability and inconsistency. POR, 13-19. Barco's argument attempts to confine the prior art solely to its explicit disclosures, disregarding how a person of ordinary skill in the art would recognize the many possible methods of implementation. As established in *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 127 S. Ct. 1727, 1741 (2007) ("[T]he analysis need not seek out precise teachings directed to the specific subject matter of the challenged claim, for a court can take account of the inferences and creative steps that a person of ordinary skill in the art would employ.") Thus, Barco's arguments lack support under prevailing legal standards. Ex-1083, ¶¶2-5.

III. GROUND I – IT WOULD HAVE BEEN OBVIOUS TO COMBINE KAPLAN WITH DEFORCHE AND AHMED.

The Petition explained how and why the POSA would have combined Ono and Deforche. For example, the POSA would have known that they could use ubiquitous pre-installed generic drivers to use a USB interface, as described by Deforche. Pet., 27-28 (citing Ex-1030, ¶¶9-11, 30; Ex-1002, ¶¶95). Deforche supports this: "HID and MSD drivers are known per se in the art an[d] therefore need not be described in detail herein." Ex-1030, ¶10; *see also id.*, ¶37. The '002 patent admits to "us[ing] the well-known USB interface of the computer for extracting the display content of the computer" Ex-1001, 4:65-67; *see also* 12:32-35. Using the pre-installed generic driver of an operating system would not only

have been obvious, but likely the first option considered by the POSA because they were so ubiquitous. Ex-1083, ¶6.

A. The POSA Would Have Had a Reasonable Expectation of Modifying Kaplan with Ahmed and Deforche.

First, it's unclear what if any relevance Kaplan's and Ahmed's disclosure of special purpose software has. The '002 patent also discloses, for example, "[T]he present invention use software stored on the peripheral device which allows screen scraping when run on the processing device." Ex-1001, 6:23-25. And Barco's system, which allegedly practices the invention, installs a special-purpose driver permanently on the computer. Ex-1070, 20:2-24:23; *see also* Ex-1001, 22:40-42 ('002 patent explaining special-purposes software is "copied temporarily into an execution context on the client processing device.")

Second, Barco's main argument, that it would not be obvious to combine Kaplan and Ahmed with Deforche's zero-footprint solution is largely irrelevant. Only unchallenged dependent claims 6 and 16, reciting a "*portable application*" arguably invoke this idea. There is no reason why it would not have been obvious to use Deforche's ubiquitous "*pre-installed generic drivers*" to implement a solution based on the combination of Kaplan, Ahmed, and Deforche.

Third, Deforche also teaches a preference to use a zero-footprint application that involves the "use of existing USB class drivers." Ex-1030, ¶¶29-43, 50-51, and FIG. 4a. It also teaches that the zero-footprint application can be any type of

application. *Id.*, ¶¶14; *see also* Ex-1072, 6:11-24 (Dr. Brogioli testifying that he did not analyze what “Ono may or may not look like for a zero-footprint software solution”). There is nothing prohibiting implementing Kaplan’s application as a zero-footprint application. The only evidence Barco identifies is Kaplan’s and Ahmed’s use of the word “install,” which according to Barco, means that installation is “required.” POR, 27-29. Moreover, Dr. Brogioli testified that installing some software would still meet the claim limitations. Ex-1070, 20:11-24:23 (testifying that Barco’s software is zero-footprint despite driver installation); *see also* Ex-1083, ¶¶4-11. Barco’s “rigid formula,” apparently requiring all limitations to be in a single reference, contravenes common sense application of Deforche’s zero-footprint advantages that would have been obvious to apply to Kaplan’s system ready for improvement. *Leapfrog Enterprises, Inc. v. Fisher-Price, Inc.*, 485 F. 3d 1157, 1161 (citing *KSR*, 27 S. Ct. at 1739).

Finally, the Petition relied on Kaplan as the primary reference and relied on Ahmed for secondary implementation details, such as “*a first audio driver*” and “*a second ... driver*,” which would have been obvious to include with Kaplan’s software in a portable, zero-footprint application as taught by Deforche. Pet., 26-28. Therefore, Kaplan provides the primary disclosure concerning software; Deforche and Ahmed disclose obvious ways of implementing Kaplan’s software as a zero-footprint application using “*pre-installed generic drivers*.”

B. Ahmed and Deforche Demonstrate a Reasonable Expectation of Success in Using First and Second “*Pre-Installed Generic Drivers*” for Audio and Video Signals.

Barco continues to apply a rigid analysis of combining references without understanding how the petition used them. The Petition relied on Ahmed’s teaching of first and second drivers to demonstrate that it would have been obvious to use different drivers for audio and video streams. Pet., ... Deforche teaches that it would have been obvious to use “pre-installed generic drivers” to send data, as disclosed by Ahmed. Indeed, Deforche acknowledges that its interface can be presented as a composite device using two drivers: HID and MSD. Ex. 1030, ¶36; Ex-1083, ¶¶12-13. Therefore, it would have been obvious to use one for audio and one for video based on the teachings of Ahmed.

C. There Is No Dispute that Deforche Teaches, “*setting up, by means of a first pre-installed generic audio driver of the operating system, a means for audio communication between the peripheral device*”

Dr. Brogioli admits that Deforche teaches this limitation. Ex-1072, 72:13-73:13; *see also* Ex-1030, abstract (“setting up, by means of a pre-installed generic driver of the operating system on the computer device, a modem/host communication interface”). Therefore, the dispute is whether it would have been obvious to use Deforche’s standard pre-installed USB drivers—found in every major operating system—that allow “*audio communication between the peripheral device and the processing device*” in Kaplan’s system. Ex-1085 (describing the standard

USB Audio Class driver included in the Windows OS). Such a combination would have been obvious and likely the first choice of the POSA because the software is so common and ubiquitous.

Barco's argument is simply that neither Kaplan nor Ahmed teach "*a pre-installed generic driver*." POR, 34-38. The entire argument ignores the Petition's argument that, to the extent that Kaplan's and Ahmed's drivers are not "*a pre-installed generic driver*," it would have been a simple substitution to use such a driver as taught by Deforche. *Id.*; *see also*, Pet., 23. Indeed, the POR does not reference Deforche at all when making this argument. *Id.* Barco wholly ignored the clear obviousness analysis in the Petition. Swapping Kaplan's and Ahmed's drivers for Deforche's would have been a simple substitution using known methods to achieve the predictable result of communicating between a processing device and a peripheral device. Ex-1083, ¶11; *see also In re O'Farrell*, 853 F.2d 894, 903, 7 USPQ2d 1673, 1681 (Fed. Cir. 1988) (citations omitted) (The claimed method would have been obvious because one reference contained a detailed enabling methodology, a suggestion to modify the prior art to produce the claimed invention, and evidence suggesting the modification would be successful).

1. The Combination of References Renders Obvious Drivers to Communicate Data

Barco alleges that Ahmed's drivers are used to capture data, not communicate it to a peripheral device. Ahmed teaches capturing *and* communicating data using

transceiver 301. Ex-1014, FIG2, 7:26-29, 14:10-13 (“the virtual display driver and mirror display driver are derived from the architecture of a normal display driver and include a miniport driver and corresponding display driver.”) Ahmed’s “miniport driver” handles communication with displays, such as the mirrored or virtual display. Ex-1083, ¶15; Ex-1081. Barco nonsensically cites Ahmed’s background as asserting allegedly discouraging its disclosed wireless transmission embodiment. POR, 36 (citing Ex-1014, 2:19-16); *see also* Ex-1014, title “Integrated Wireless Multimedia Transmission System.” Ahmed also discloses that the virtual audio cable (VAC) captures data that is “then transmitted 505 simultaneously in a synchronization manner wirelessly to a receiver.” *Id.*, 19:10-11. More importantly, the Petition relied on Kaplan for the transmitter in the peripheral device. Pet., 30-31. Ahmed simply teaches drivers for communicating audio/video data to a transceiver such as Kaplan’s. *Id.*, 32-37.

Barco’s argument that Deforche does not disclose “*audio*” communication is spurious. Deforche is agnostic about data type. Ex-1070, 12:2-19 (Dr. Brogioli testifying that Deforche’s transmitter can send any data type, including audio). Therefore, it’s irrelevant whether the word “*audio*” appears in Deforche because Deforche’s system can be used for any type of digital data.

D. The Petition Consistently Referred to the Same Components in the Proposed Combination for Antecedent Basis

Barco's antecedent-basis arguments rely on the same strategy of focusing on individual references rather than the proposed combination. Each of Kaplan, Ahmed, and Deforche discloses using drivers. Ex-1027, ¶¶46-48 (Kaplan disclosing using Windows, which has mass-storage drivers), Ex-1014, 14:10-13; 17:3-16, 18:26-19:21 (Ahmed disclosing a separate "normal audio driver" and a "mirror display driver" or "normal display driver"); Ex-1030, ¶10 (Deforche disclosing "a human interface device (HID) [or] a mass storage device (MSD) driver.") Ex-1083, ¶¶11, 14. The Petition explained that Ahmed teaches using first and second drivers for separate audio and video streams, while Kaplan and Deforche teach that those drivers can be "*pre-installed generic drivers*," such as an MSD or HID driver. Pet., 26-28, 32-35, 41. The combination proposed in the Petition relies primarily on Kaplan and uses Ahmed and Deforche to demonstrate that specific claim limitations were obvious implementation details as disclosed by the combination of references.

IV. GROUND II – IT WOULD HAVE BEEN OBVIOUS TO COMBINE MAEDA WITH DEFORCHE AND AHMED.

Barco's states that "Ground 2 fails for the same reasons" as Ground 1. POR, 43.

A. The POSA Would Have Had a Reasonable Expectation of Modifying Meada with Ahmed and Deforche.

First, it's unclear what if any relevance Maeda's and Ahmed's disclosure of special purpose software has. The '002 patent also discloses, for example, "[T]he present invention use software stored on the peripheral device which allows screen scraping when run on the processing device." Ex-1001, 6:23-25. And Barco's system, which allegedly practices the invention, installs a special-purpose driver permanently on the computer. Ex-1070, 20:2-24:23; *see also* Ex-1001, 22:40-42 ('002 patent explaining special-purposes software is "copied temporarily into an execution context on the client processing device.")

Second, Barco's main argument, that it would not be obvious to combine Maeda and Ahmed with Deforche's zero-footprint solution is largely irrelevant. Only unchallenged dependent claims 6 and 16, reciting a "*portable application*," arguably invoke this idea. There is no reason why it would not have been obvious to use Deforche's ubiquitous "*pre-installed generic drivers*" to implement a solution based on the combination of Maeda, Deforche, and Ahmed.

Third, Deforche also teaches a preference to use a zero-footprint application that involves the "use of existing USB class drivers." Ex-1030, ¶¶16, 28-43, 50-51, and FIG. 4a. It also teaches that the zero-footprint application can be any type of application. *Id.*, ¶¶14; *see also* Ex-1072, 6:11-24 (Dr. Brogioli testifying that he did not analyze what "Ono may or may not look like for a zero-footprint software

solution”). There is nothing prohibiting implementing Maeda’s application as a zero-footprint application. Ex-1083, ¶¶16-18. The only evidence Barco identifies is Maeda’s and Ahmed’s use of the word “install,” which according to Barco, means that installation is “required.” POR, 44. Moreover, Dr. Brogioli testified that installing some software would still meet the claim limitations. Ex-1070, 20:11-24:23 (testifying that Barco’s software is zero-footprint despite driver installation); *see also* Ex-1083, ¶¶16-18. Barco’s “rigid formula,” apparently requiring all limitations to be in a single reference, contravenes common sense application of Deforche’s zero-footprint advantages that would have been obvious to apply to Maeda’s system ready for improvement. *Leapfrog*, 485 F. 3d at 1161 (citing *KSR*, 27 S. Ct. at 1739).

Finally, the Petition relied on Maeda as the primary reference and relied on Ahmed for secondary implementation details, such as “*a first audio driver*” and “*a second ... driver*,” which would have been obvious to include with Maeda’s software in a portable, zero-footprint application as taught by Deforche. Pet., 46-47. Therefore, Maeda provides the primary disclosure concerning software; Deforche and Ahmed disclose obvious ways of implementing Maeda’s software as a zero-footprint application using “*pre-installed generic drivers*.”

1. Ahmed and Deforche Demonstrate a Reasonable Expectation of Success in Using First and Second “*Pre-Installed Generic Drivers*” for Audio and Video Signals.

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obvious and likely the first choice of the POSA because the software is so common and ubiquitous.

Barco's argument is simply that neither Maeda nor Ahmed teach "*a pre-installed generic driver*." POR, 45-46. The entire argument ignores the Petition's argument that, to the extent that Maeda's and Ahmed's drivers are not "*a pre-installed generic driver*," it would have been a simple substitution to use such a driver as taught by Deforche. *Id.*; *see also*, Pet., 23. Indeed, the POR does not reference Deforche at all when making this argument. *Id.* Barco wholly ignored the clear obviousness analysis in the Petition. Swapping Maeda's and Ahmed's drivers for Deforche's would have been a simple substitution using known methods to achieve the predictable result of communicating between a processing device and a peripheral device. Ex-1083, ¶14; *see also In re O'Farrell*, 853 F.2d 894, 903, 7 USPQ2d 1673, 1681 (Fed. Cir. 1988) (citations omitted) (The claimed method would have been obvious because one reference contained a detailed enabling methodology, a suggestion to modify the prior art to produce the claimed invention, and evidence suggesting the modification would be successful.).

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Barco's antecedent-basis arguments rely on the same strategy of focusing on individual references rather than the proposed combination. Each of Maeda, Ahmed, and Deforche discloses using drivers. Ex-1027, ¶¶46-48 (Maeda disclosing using standard PC which obviously includes an operating system and drivers), Ex-1014, 14:10-13; 17:3-16, 18:26-19:21 (Ahmed disclosing a separate "normal audio driver" and a "mirror display driver" or "normal display driver"); Ex-1030, ¶10 (Deforche disclosing "a human interface device (HID) [or] a mass storage device (MSD) driver.") Ex-1083, ¶¶11, 14. The Petition explained that Ahmed teaches using first and second drivers for separate audio and video streams, while Maeda and Deforche teach that those drivers can be "*pre-installed generic drivers*," such as an MSD or HID driver. Pet., 26-28, 32-35, 41. The combination proposed in the Petition relies primarily on Maeda and uses Ahmed and Deforche to demonstrate that specific claim limitations were obvious implementation details as disclosed by the combination of references.

V. THE PROPOSED GROUNDS ARE CONSISTENT WITH THE PROPOSED CONSTRUCTIONS.

Barco objects to the Petition's condensing of substantively identical claim limitations from claims 1, 11, and 12, because claim 11 recites the same limitations but adds "*means for*" limitations, while claim 21 is slightly more different and adds "*software code portion[s]*." POR, 39-42, 46-47. The structure for the means limitations is the same structure that is in the claim and defined in the specification, and Barco makes no argument for any substantive difference. Pet., 14-19. Yealink condenses Barco's objection for both grounds in this section.

The Petition described in writing and with particularity the grounds on which the challenge to each claim was based. The analyses for claims 1, 11, and 21 are essentially identical. The only relevant difference between claims 1 and 11 is a "*means for*" before each gerund. Claim 21 largely adds first, second, and third "*software portions*" before the gerund. Barco identifies not substantive differences between the claims. *See, e.g., Telit Cinterion Deutschland GmbH v. 3G Licensing, S.A.*, No. 2023-1497, 2025 WL 401647, at *2 n.3 (Fed. Cir. Feb. 3, 2025) (treating multiple claims as substantively identical).

For limitation "a)", the "*means for [or] coupling an external peripheral device physically to a port*" is Kaplan's "USB port" for both claims 1 and 11. Pet., 30-31. Claim 21 recites a substantively identical limitation of "*a connection configured to be physically coupled to a port of the processing device.*"

For limitation “b)”, the “means for [or] first software code portion for setting up” is the combination of Grounds 1 and 2, teaching a “*first pre-installed generic driver.*” *Id.*, 32-34, 52-55.

For limitation “c)”, there is also no material difference:

Claim 1	Claim 11	Claim 21
c) using the peripheral device to connect the processing device to a communications network via the wireless transceiver;	c) ~~using~~ wherein the peripheral device <u>is configured in a way</u> to connect the processing device to a communications network via the wireless transceiver;	e) ~~using the peripheral device to connect a~~ <u>second software code portion for connecting</u> the processing device to a communications network via the wireless a transceiver of the peripheral device;

Kaplan renders this limitation obvious by disclosing a combination of hardware (e.g., transmitter) and software for connecting the processing device to the network. *Id.*, 35-37, 55-57.

For limitation “d)”, the “means for [or] second software code portion for setting up” is the combination of Kaplan, Ahmed, and Deforche, teaching a “*second pre-installed generic driver.*” *Id.*, 34-35, 57.

For limitation “e)”, the “means for [or] third software code portion for routing” is Kaplan’s transmitter. *Id.*, 38-39, 57-59.

Barco identifies no material differences between the claim limitations. The claim construction section of the Petition addressed the differences by showing that the various limitations all mean the same things.

VI. SECONDARY CONSIDERATIONS DO NOT OVERCOME THE STRONG SHOWING OF OBVIOUSNESS.

This is not a close case. Barco's arguments for patentability are weak, focusing on limitations squarely and admittedly in the prior art. Barco's arguments concerning rationale-to-combine question why the POSA would have altered the systems that are already fully functional. As explained throughout this reply, the law does not support these arguments. Moreover, Barco has failed to demonstrate nexus for any alleged commercial success.

A. Barco's ClickShare Product Lacks Nexus because It Is Not Essentially the Claimed Invention.

Barco is not entitled to a presumption of nexus "[w]hen the thing that is commercially successful is not coextensive with the patented invention—for example, if the patented invention is only a component of a commercially successful machine or process." *Demaco Corp. v. F. Von Langsdorff Licensing Ltd.*, 851 F.2d 1387, 1392 (Fed. Cir. 1988)). Nexus is not shown when "the patented invention is only a component of a commercially successful machine or process." *Id.* "[U]nclaimed features [must] amount to nothing more than additional insignificant

features” to presume nexus. *Fox Factory, Inc. v. SRAM, LLC*, 944 F.3d 1366, 1374 (Fed. Cir. 2019)

Barco's ClickShare product is not coextensive with the claimed invention because it includes significant unclaimed features. For example, the ClickShare product can work with or without a peripheral device (dongle) by using either the ClickShare app or other platforms, such as Teams or Zoom. Ex-1076 (Barco base unit sold without dongles and works with Teams and Zoom); Ex-1077 (Barco instructions for using a base unit without a dongle). Indeed, Mr. Ludke of Crestron testified that he was “surprised” that anyone would want to use a dongle because, “as you can just join a Teams meeting from your laptop without using” a dongle. Ex-1090, 100:25-101:20. Dr. Brogioli could not even recall ever using a dongle to share content prior to this case. Ex-1084, 91:14-23. Using the ClickShare Product without the dongle is not an insignificant feature; nexus, therefore, cannot be presumed.

Importantly, Barco has several patents covering patentably distinct inventions including, for example, at least U.S. Patent Nos. the '002 patent (Ex-1001), 11,403,237 (the '237 patent, Ex-1087), 11,422,951 (the '951 patent, Ex-1089), and 11,258,676 (the '676 patent, Ex-1088). Only the '951 patent has a terminal disclaimer and this is over a separate patent application 15/449,048 corresponding to U.S. Patent No. 10,585,814. Barco's Technology & Innovation Director testified

that each patent is independently valuable, suggesting that the '002 patent is at most one of many reasons for Barco's revenue. Ex-1078, 141:20-143:18. Indeed, the '002 patent is directed to media sharing methods and systems that employ **separate pre-installed generic drivers to set up audio and data communication**, allowing audio data to be routed to the peripheral device and to a base node over a communications network. The '237 patent is directed to connecting a processing device to a communications network using an external peripheral device that is **presented as a human interface device**, enabling the communication of audio and display data to the peripheral device and then to a base node over a network. The '676 patent is directed to an electronic meeting system that allows users to share arbitrary media content from their devices to a display through a network using a peripheral device **with rules for display control**. The '951 patent is directed to an electronic meeting tool that enables users to communicate and display arbitrary media content from their devices to a central display via a wireless network using a peripheral device **via a user input on a physical actuator on the peripheral device**. Thus, none is coextensive with the *entire* ClickShare product because there are several patents covering different critical features of that product.

B. Barco Failed to Demonstrate “Commercial Success” Due to the Claimed Features.

Barco's Evidence of revenue alone is insufficient to demonstrate secondary considerations without showing that those aspects are the “direct result” of the

claimed features. *In re Huang*, 100 F.3d 135, 140 (Fed. Cir. 1996). Barco relied entirely on the presumption of nexus and made no attempt to demonstrate that revenue generated was due to the claimed features as opposed to significant unclaimed features. It is impossible to separate revenue generated from the claimed features and other commonly used features, *e.g.*, compatibility with the ubiquitous Teams and Zoom tools. Indeed, Yealink stopped selling dongles in the U.S., but still has a business selling base units, demonstrating that base units have material value even without a dongle. Ex-1082. Barco's products are also perfectly functional without using a dongle or "*peripheral device*." Ex-1076, Ex-1077. Barco makes no attempt at the required showing of how much revenue is attributable to the claimed features as opposed to unclaimed features.

1. Barco Failed to Show the '002 Patent Covers Crestron's Products.

As for Barco's reliance on Crestron's products, Barco must show more than the mere existence of a license. *See Sibia Neurosciences, Inc. v. Cadus Pharm. Corp.*, 225 F.3d 1349, 1358 (Fed. Cir. 2000) ("[T]he mere existence of these licenses is insufficient to overcome the conclusion of obviousness"); *see also Merck & Cie v. Gnosis S.P.A.*, 808 F.3d 829, 838 (Fed. Cir. 2015) ("It is therefore difficult to determine the extent to which the licensing agreement was a result of the novel features in the [challenged] patent, as opposed to the other patents involved."). Yet Barco offers little beyond just that. In fact, the Crestron license included many

unrelated and foreign patents, including those from a different patent family. *See* Ex-2011, 15. Moreover, Barco's damages expert, when addressing the same license, testified that the agreement was driven by underlying "business" factors and "benefits" beyond the patents themselves. *See, e.g.,* Ex. 1091, 73:7-74:3, 105:8-106:1. [REDACTED]

[REDACTED] Ex-1090, 58:7-12.

There is no evidence that Crestron entered the license because it believed that Barco's patents were valid or enforceable. *Teva Pharms. Int'l GmbH v. Eli Lilly & Co.*, 8 F.4th 1349, 1364 (Fed. Cir. 2021). The Federal Circuit affirmed a Board decision holding the Patent Owner did not show "that any of the challenged patents cover the [licensee's] Product by a comparison of the [] product to the challenged claims." *Id.* Here, too, Barco fails to explain how Crestron's products embody the claim limitations. Therefore, there is insufficient evidence of a nexus.

VII. CONCLUSION

Barco fails to rebut the prima facie showing of obviousness, and the evidence of secondary considerations is insufficient. Petitioner therefore asks the Board to find the challenged claims to be unpatentable.

Dated: October 15, 2025

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned hereby certifies that the word count for the foregoing Petitioner's Reply totals 4,636 as counted by Word Count feature of Microsoft Word, which is less than 5,600 allowed under 37 C.F.R. § 42.24(a)(1)(i), excluding the parts of the paper exempted by 37 C.F.R. §42.24(a).

Dated: October 15, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2025, I caused a true and correct copy of the foregoing Petitioner's Reply and supporting exhibits to be served on the Patent Owner at the following correspondence addresses of record:

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