1 UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

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5 YEALINK (USA) NETWORK TECHNOLOGY CO., LTD., and YEALINK NETWORK TECHNOLOGY CO., LTD.,

6

7 Petitioners, Case No. IPR2024-01438

8 vs.

9 BARCO N.V.,

10 Patent Owner.

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14 DEPOSITION OF KEVIN C. ALMEROTH, Ph.D.

15 Santa Barbara, California

16 Wednesday, July 2, 2025

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21 Stenographically Reported by:

22 JUSTYNE N. JOHNSON
RPR, CSR. No. 14301

23 Job No. 589279

24 Pages 1-36

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BARCO EXHIBIT 2009
Yealink v. Barco
IPR2024-01437

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3 The Deposition of KEVIN C. ALMEROTH, Ph.D., was taken
4 on behalf of Patent Owner, at 1111 East Cabrillo
5 Boulevard, Santa Barbara, California, beginning at 7:59
6 a.m., Pacific time, on July 2, 2025, before JUSTYNE
7 JOHNSON, RPR, Certified Shorthand Reporter No. 14301.
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1 APPEARANCES:
2
3 FOR PLAINTIFFS
4 K&L GATES, LLP
5 BY: ERIK HALVERSON, ESQ.
6 Attorney at Law
7 4 Embarcadero Center
8 Suite 1200
9 San Francisco, California 94111
10 Erik.halverson@klgates.com
11
12
13 FOR DEFENDANTS
14 DENTONS US, LLP
15 BY: STEPHEN YANG, ESQ.
16 Attorney at Law
17 1221 Avenue of the Americas
18 New York, NY 10020
19 Stephen.yang@dentons.com
20
21 ALSO PRESENT:
22 Kevin Greenleaf, Dentons US
(Via Zoom videoconference)
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1 INDEX

2 WITNESS EXAMINATION

3 KEVIN C. ALMEROTH, Ph.D.

4 BY MR. HALVERSON.....7

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1 EXHIBITS
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WITNESS INSTRUCTED NOT TO ANSWER
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(None)
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1 Santa Barbara, California
2 July 2, 2025 | 7:59 a.m.
3
4 THE STENOGRAPHER: Good morning. We are going on
5 the record at 7:59 a.m., on Wednesday, July 2, 2025, in
6 the matter of Yealink (USA) Network Technology Co., Ltd.,
7 et al., v. Barco N.V., Case Number IPR2024-01438. Today's
8 deposition is taking place at 1111 East Cabrillo
9 Boulevard, Santa Barbara, California.
10 My name is Justyne Johnson. I am a California
11 certified shorthand reporter representing the firm Planet
12 Depos, and my certification number is 14301. The deponent
13 is Kevin C. Almeroth, Ph.D.
14 Counsel, can you please introduce yourselves.
15 MR. HALVERSON: Erik Halverson from K&L Gates on
16 behalf of Barco, N.V., patent owner.
17 MR. YANG: Stephen Yang from Dentons,
18 representing Petitioner Yealink and the witness.
19 THE STENOGRAPHER: Dr. Almeroth, can you raise
20 your right hand, please?
21
22 KEVIN ALMEROTH, Ph.D.,
23 having first been sworn by the Certified Shorthand
24 Reporter, was examined and testified as follows:
25 THE WITNESS: Yes, ma'am, I do.

1 EXAMINATION
2 BY MR. HALVERSON:
3 Q Welcome back, Dr. Almeroth.
4 A Thank you.
5 Q Since we chatted yesterday and the day before,
6 has your background changed at all?
7 A It has not.
8 Q Wonderful. You have been handed a handful of
9 exhibits today for this morning's deposition, including
10 Exhibit 1001, which is the '676 patent.
11 A Yes.
12 Q As well as Exhibit 1002, which is your
13 declaration in this proceeding, and Exhibit 1005, which is
14 the ONO reference. You also have in front of you a
15 handful of goodies from earlier in the week.
16 If at any time you need an additional document to
17 respond to a question or if you think some context would
18 be helpful, by all means, go ahead and ask. We've got
19 boxes of paper behind me (indicating). I'm confident we
20 have it if it's part of the proceeding.
21 With that, feeling all right this morning?
22 A Yes, sir.
23 Q Let's dive --
24 A Ready to go.
25 Q Let's dive in.

1 What is a client application?
2 A I think it would be just the plain and ordinary
3 meaning of a client application, typically, an application
4 that would run on the client as an application. Example
5 of something would be potentially something a user could
6 access. So I could think of examples, like Word or
7 conferencing application, running on a client as examples.
8 Q So we talked a little bit earlier this week about
9 software applications.
10 Is a software application the same as a client
11 application?
12 A Not necessarily. Not typically.
13 Q What's the difference?
14 A One is just software. Client application is
15 likely software, but a software application need not run
16 on a client.
17 Q Where else would a software application run?
18 A Anything that's not client. Actually, it could
19 run on a client too. It could basically run on anything
20 that could support a software application.
21 Q So is it fair to say that a software application
22 is a broader definition than a client application?
23 A That would require answering the question of
24 whether or not all client applications are software
25 applications. Sitting here now, I can't think of an

1 example where there is one that is a client application
2 but not a software application. But to the extent there
3 would be one, then that suggests it's not fully subsumed
4 by the other, meaning that the it -- that a client
5 application is not fully subsumed by a software
6 application.
7 Q And then so in response to my question of where
8 else would a software application run, you said, "anything
9 that's not a client actually could run on a client too."
10 And so what kind of nouns, other than a client,
11 would run a software application?
12 A I don't have a list for you. It's basically
13 anything that could execute the instructions. So
14 something like a processor.
15 Q And I guess, what are you differentiating a
16 client from?
17 A Nonclients.
18 Q Can you give me an example of a nonclient?
19 A Potentially a server. It would depend on how the
20 term client applique -- or client is being applied,
21 whether it's a user client. I could think of, if you're a
22 network administrator, you might consider running an
23 application on a server as the client application. So it
24 might depend on perspective.
25 Q So the --

1 A It's a fairly broad term.
2 Q So context matters?
3 A Context would matter.
4 Q Does a client application have to be executed on
5 a client?
6 A No, for at least the reason it doesn't need to be
7 executed at all.
8 Q Can a client application be executed on a
9 nonclient?
10 A It depends. So I can think of an example where
11 you might consider Word, Microsoft Word, to be a client
12 application. It could run on a client -- a user computer
13 and type of scenario like that. Word could also be
14 executed on other kinds of devices. I suppose you could
15 have a server running Windows and could execute Microsoft
16 Word. Again, assuming the server is interpreted not to be
17 a client, then you could have a client application that
18 could run on a server.
19 So depending on how those terms are specifically
20 defined, your scenario seems like it's a possibility.
21 Q Are you familiar with the term "portable
22 application"?
23 A I have seen that term.
24 Q Have you seen it before the context of this
25 proceeding?

1 A I suspect I have.
2 Q What is a portable application?
3 A That one depends on context. It could mean
4 different things.
5 Q How about in the context of the '237?
6 A I don't recall taking a position on what that
7 term meant, and I don't recall the context in which it was
8 used. And I think you said, "the '237," and I don't
9 remember the context in which it was used for the '237.
10 Q I'm sorry. That was a poorly que- -- poorly
11 asked question.
12 How about in the context of the '676?
13 A It would be the same answer minus the -- you're
14 asking about the '237. So to be clear, I don't recall
15 taking a position on what that term meant, and I don't
16 remember the context in which that term is used.
17 Q Okay. How about "democratic screensharing"? Do
18 you recall using that term in your declaration?
19 A Vaguely.
20 Q Can you go to paragraph 62 of your declaration in
21 this proceeding? It's on page 44.
22 A I'm there.
23 Q What do you mean by where the conference session
24 has been designated as, quote/unquote, "democratic"?
25 A That, I suspect is a term that's used in the

1 Hill '557 --
2 Q Would you --
3 A -- reference.
4 Q -- like the Hill '557 reference?
5 A Yes, please.
6 Q I could also direct you to the paragraph before
7 that --
8 A Let's see...
9 Q -- where the block quote in the middle and the
10 e.g. -- it's not a parenthetical, but it's set off by
11 parentheses -- uses the phrase also. But let me get you
12 to the Hill '557.
13 A Okay.
14 MR. HALVERSON: It's 1013; right?
15 MR. YANG: Correct.
16 Thank you.
17 MR. HALVERSON: Welcome.
18 THE WITNESS: I don't have an electronic version,
19 obviously. So I don't know if the word "democratic" comes
20 up in any other scenario or provides any more description.
21 But based on paragraph 49 from Hill, Exhibit 1013 -- I'll
22 just read that part. "If the device that generated the
23 screenshare request has override status -- e.g., the
24 device is the central computer -- is a device associated
25 with a participant having administrative privileges or the

1 conference session is democratic," and then it goes on
2 from there.
3 So the first two are pretty straightforward. I'd
4 have to see if Hill describes the override mechanism for
5 the democratic process.
6 This paragraph 62 indicates -- it's got an "or"
7 in the -- in the cases there. So it -- it certainly would
8 be the case for the administrative privileges scenario
9 where screen data is replaced or overwritten without
10 requiring the agreement of another participant. And I
11 suspect that that's tied to the override status. So I
12 think that override status would even apply in a
13 democratic conference session.
14 BY MR. HALVERSON:
15 Q Which override status are you referring to?
16 A The one in the quote. It says, "if the device
17 that generated the screenshare request has override
18 status."
19 Q So you're interpreting that e.g. as a
20 three-part -- or three-case list with an "or" between them
21 and then that being open-ended because it's an e.g.; is
22 that right?
23 A That's right. It's an e.g., so for example. It
24 would be open-ended, and it lists three options for when a
25 device might have override status, which, as it describes,

1 override status is sharing of the existing screen is
2 terminated, and then the screen associated with the device
3 that generated the screenshare request is shared.
4 Q And so all of this stemmed out of a series of
5 questions about what -- what the Hill '557, as well as
6 yourself, are referring to when, in paragraph 62, you used
7 the phrase "democratic."
8 So other than just what Hill says, is there
9 anything else that you'd add as far as context for what
10 you mean by "democratic"?
11 A Sure. The -- the context is scenarios in which a
12 device can have override status. And that's the aspect
13 that becomes relevant. And so it presents the three
14 options, and that's -- that's what I'm referring to.
15 So democratic status, it isn't particularly
16 relevant on exactly what it is other than at least one
17 device can have override status. And the override status
18 would terminate what's being displayed and display the
19 device that has override status, its screen.
20 Q Talked a fair amount about drivers earlier in the
21 week.
22 Any of your testimony about drivers change?
23 A No.
24 Q How about any testimony about generic drivers or
25 preinstalled generic drivers?

1 A No changes.
2 Q We talked about a handful of types of generic USB
3 drivers, human interface device, mass storage device, et
4 cetera. Do you remember that?
5 A I do. One -- one adjustment: They're types of
6 interfaces -- I call them modes -- within the USB
7 standard. So they're different drivers within USB.
8 Q And I think USB uses the phrase "class."
9 Is class and mode the same?
10 A My recollection was the reference that described
11 USB said it was an interface. That interface would apply
12 to a class of devices.
13 Q And so why are there different USB drivers?
14 A The drivers -- the different drivers would and
15 did implement different interface types. There are
16 different primitives associated with the different
17 interface types. And so there would be different drivers
18 to implement the different interfaces. And more over, you
19 could have different drivers for different operating
20 systems. So the driver is the specific implementation of
21 the interface. There will be different implementations of
22 the drivers as well.
23 So for example, you could have a Windows driver;
24 you could have a driver for Mac OS, and then both of those
25 could implement the same interface within USB. You could

1 implement all of the interfaces with a USB, and then you
2 could have other drivers as well, as we discussed.
3 Q You used the phrase "primitives" there.
4 What is primitives?
5 A So primitives are the set of instructions. I
6 think the example we used earlier in the week was the idea
7 of if a USB device were mounted as a mass storage device,
8 you would get primitives like read and write. So the
9 system -- the operating system and the applications,
10 running on that system would understand that the attached
11 device is a mass storage device, and so the typical mass
12 storage device primitives or commands, things like reads
13 and writes, seeks, are the kinds of primitives or commands
14 that would be made available through that interface as
15 implemented by the driver.
16 Q So what kind of primitives exist for a human
17 interface device driver?
18 A Within USB, I don't recall what the primitives
19 are. It's in the USB standard. I just don't have those
20 memorized.
21 Q Are they the same primitives that exist for the
22 mass storage device driver?
23 A My recollection is that they are not the same set
24 of primitives. They may overlap, but they aren't the
25 same. Again, I would defer to what the USB spec says

1 about those interfaces.
2 Q So is there functionality that's available when a
3 device presents itself as a mass storage device that is
4 different than functionality that is available when a
5 device presents itself as a human interface device?
6 A Focusing on the set of primitives or commands,
7 yes, to my recollection, because there are different sets
8 of commands then an application can take advantage of the
9 different sets.
10 As we discussed, I think this was more yesterday,
11 an application can implement just about anything over the
12 interface. Sometimes it's implemented in the application,
13 sometimes there are primitives that better support that
14 particular functionality. So, for example, if you've got
15 something mounted as a mass storage device -- and I think
16 I mentioned this scenario yesterday -- you could still
17 stream audio and video data just by doing reads and writes
18 and then having the application be able to deal with all
19 of the other issues that are specific to the audio and
20 video. Things like synchronization, we also talked
21 yesterday about retransmissions, those kinds of things.
22 Q And so in that context where you are streaming
23 audio and video data from a mass storage device, is the
24 streaming live streaming or playing from a file or does it
25 not matter?

1 A The first part of your question seemed to make
2 the assumption that it was coming from a mass storage
3 device. In that instance, I don't think it would
4 typically be referred to as live. The exception to that
5 could be that you have a live event. It's being encoded
6 and stored and then the live stream is read from the mass
7 storage device. So the path is live event encoder, mass
8 storage device read and then streamed. I suppose it would
9 appear to be live even though it's coming from a mass
10 storage device.
11 Typically if it's a live event, it goes into a
12 buffer and then the buffer goes to the live streamer.
13 Q Could one configure a video camera to use the
14 mass storage device driver?
15 A Yes.
16 Q And in that scenario, could it be -- sorry.
17 In that scenario, could there be live video being
18 transmitted over the mass storage device driver?
19 A I don't see any other reason why that wouldn't
20 have been possible. It would just require a video camera
21 to be able to generate the stream of data. Once you have
22 something like that, then you could transmit that over a
23 USB mounted camera using the mass storage device driver.
24 There are predecessors to GoPros that had that kind of
25 capability.

1 Q Is there a reason that one would not use a mass
2 storage device driver for a USB video camera?
3 A There might be better ways to do it or
4 alternatives to do it. But I think it's certainly one of
5 the options of the types of interfaces through USB, and a
6 person of skill in the art prior to 2010 certainly could
7 have done it that way.
8 Q You've got Ono in front of you, 1005. You agree
9 that Ono supports multiple users casting to a screen;
10 right?
11 A That was my recollection.
12 (Stenographer clarification.)
13 BY MR. HALVERSON:
14 Q And how does a user initiate the transfer of
15 their screen information in Ono, if you recall?
16 A I don't have Ono memorized. To the extent it was
17 relevant to a particular limitation, then I would have
18 described or at least referenced where in Ono that process
19 is described. My recollection is that Ono...
20 Q If you look at, for example, paragraph 144 of
21 Ono. It's also in paragraph 93, I think, of your
22 declaration.
23 A Right. What I was looking for was to confirm
24 that there was a reference to USB in Ono. There is, at
25 least in paragraph 54, once it describes USB as what was

1 in use, then all of the set up of how the device -- the
2 peripheral device would be recognized by the computer is
3 supported by how USB works. But then you had also pointed
4 to what paragraph of the declaration?
5 Q I think I said 93. Although 94, maybe.
6 A That's a higher-level description of the
7 reference. I think when you get to limitations that
8 relate to setting up, those would provide additional
9 support. And I think it is largely -- my recollection is
10 that it's based on USB. So as an example, that's
11 limitation 1B, paragraph 119.
12 Yes. Oh, wait. '676.
13 Q Perhaps you were approaching a slightly different
14 paragraph 55, maybe -- of Ono may be what you were -- but
15 maybe not?
16 A 55.
17 Q Sorry. Of Ono, not of your --
18 A Oh. So -- sorry. The preamble is broken up into
19 multiple steps for Claim 1 of the ''676 patent. The
20 setting up limitation is paragraph 128 of my declaration.
21 That's on page 92. That's where it does reference USB.
22 It does cite to paragraph 55 of Ono. That's what I had
23 mentioned earlier. So it is in Ono based on the reference
24 to USB and then there's the additional detail of Ono --
25 sorry. The additional detail of how that would be

1 implemented that comes from Deforche.
2 Q And does Ono require the installation of software
3 on the client device?
4 A My recollection is that it does not. There is an
5 embodiment within Ono where it does describe storing the
6 connection application, the driver and configuration
7 information on the hard drive. But it is not my
8 recollection that that was a limiting aspect of Ono's
9 invention.
10 Q And where are you looking at?
11 A I'm --
12 Q What aspect -- sorry, go ahead.
13 A Looking at paragraph 135 of my declaration. That
14 has references to paragraphs 54, 55 of Ono, and then it
15 sort of goes on from there. Because there's the USB
16 memory 45 and then the wireless connection module 44 and
17 so there's discussion as it relates to the coupling
18 limitation about where the client application is stored.
19 And so that gets into some of the later references.
20 Q And are 44 and 45 part of the client device or
21 the information terminal apparatus, I think is what Ono
22 calls them?
23 A They are not part of the client device. 44, I
24 believe, is part of the peripheral -- what I've identified
25 as the peripheral device.

1 Q Is Ono a -- well, precursor question. Are you
2 familiar with zero footprint?
3 A I am.
4 Q Are you familiar with zero footprint before this
5 exercise?
6 A Yes.
7 Q What is zero footprint?
8 A It depends on context.
9 Q In the context of the -- these patents, what is
10 the zero footprint?
11 A I am not sure. I've taken a position as to what
12 that term means in the context of this declaration. So I
13 would have to look back in the spec to figure out what it
14 says about zero configuration.
15 Q And is there a difference between "zero
16 configuration" and "zero footprint" as far as --
17 A Oh, I'm sorry. I meant to use the word you used,
18 and I thought you said "configuration." You said
19 "footprint." I should have said "footprint" in my
20 previous answer.
21 Q Can you go to paragraph 102 of your declaration?
22 MR. YANG: Sorry about that.
23 MR. HALVERSON: 102.
24 MR. YANG: Thank you.
25 MR. HALVERSON: I want to ask about something on

1 page 71, but feel free to --
2 THE WITNESS: Okay.
3 MR. HALVERSON: -- get the context.
4 THE WITNESS: Okay. I'm there.
5 BY MR. HALVERSON:
6 Q Last sentence is quoting Deforche. It uses the
7 phrase "zero footprint" followed by an i.e. Is that
8 consistent with your understanding of "zero footprint"?
9 A Your question is ambiguous as to context. That's
10 my understanding of what "zero footprint" means in the
11 context of Deforche.
12 Q And as far as you know, you don't have a
13 different -- I guess, did you use that understanding of
14 "zero footprint" in the context of these patents?
15 MR. YANG: Object to form.
16 THE WITNESS: I don't recall when you broaden it
17 out into -- in the context of these patents. I don't
18 believe that was a claim term for the ''676 patent. If
19 I'm misremembering, then you can correct my recollection.
20 I do think it comes up or a concept like that in another
21 IPR and a different patent. But I don't have those claims
22 in mind sitting here right now and what that declaration
23 says about zero footprint.
24 Q Do you have Deforche in front of you?
25 A I do.

1 Q Does Deforche discuss sharing content between
2 more than one device?
3 A I don't recall if it does or not. I don't recall
4 relying on Deforche for that concept. Again, if I'm
5 misremembering in the '676 declaration, then I would defer
6 to what the declaration says.
7 Q That question wasn't the best question, so let me
8 try it slightly differently, may be the same answer. But
9 does Deforche discuss sharing content from more than one
10 device to a display?
11 A Same answer.
12 Q Does Deforche describe a forcing rule?
13 A I don't recall if it does or not. It's not my
14 recollection that I've relied on Deforche for that
15 concept.
16 Q And we spent a fair amount of time on Monday
17 talking about the preinstalled generic drivers of
18 Deforche.
19 Do you recall that?
20 A Yes.
21 Q Do you know whether or not there are any
22 device-specific drivers that are part of Deforche's
23 teachings?
24 A I think you actually asked that question before,
25 and I think the answer is that I think there is a

1 discussion about those drivers in the context of what
2 Deforche was trying to overcome. And so there might be
3 discussions of specific drivers. In fact, I think one of
4 the quotes from Deforche in one of the two declarations
5 says that what's trying to be overcome is the idea that
6 there's a specific driver that Deforche wants to be able
7 to use a preinstalled generic driver instead of. So there
8 might be mentions of specific drivers in the context of
9 Deforche.
10 Q As far as, like, what Deforche is trying to
11 improve upon? So, like, paragraph 2 or paragraph 9?
12 A 2 just says an appropriate driver. I do -- and
13 at the end of paragraph 9, it does mention administrator
14 rights in the context of a specific driver. But again,
15 where I'm really focused on is the disclosure in Deforche
16 about the use of a preinstalled generic driver.
17 Especially as it relates to the understanding a person of
18 skill in the art would have based on the primary reference
19 and then motivating that particular aspect as part of the
20 additional description demonstrating the knowledge a
21 person of ordinary skill in the art would have had.
22 Q Can you go to paragraph 152 of your declaration?
23 It's on page 111.
24 A Okay.
25 Q Here, you've got a section titled "Rationale to

1 Combine."
2 Do you see that?
3 A Yes.
4 Q What are you combining?
5 A Really, it's a single reference combination, and
6 it's knowledge of a person of skill in the art. There
7 isn't a specific alternative reference identified, though
8 it does reference something that was admitted prior art
9 from the ''676 patent. But that really just supports the
10 concepts a person of skill in the art would have known.
11 Q Okay. Are you familiar with the concept of
12 screen scraping?
13 A Yes.
14 Q What is screen scraping?
15 A Generally, it is the concept of being able to
16 capture or replicate what's being displayed on a screen.
17 Q Is there a distinction between those two words,
18 "capture" and "replicate," in your mind?
19 A Not to my recollection in the context of the
20 ''676 patent. It doesn't claim a particular way of screen
21 scraping, though, in practice, there might be different
22 ways of implementing it.
23 Q And is there a difference between screen scraping
24 and rendering a second iteration of what is to be
25 displayed?

1 A That would require having a specific definition
2 of screen scraping and understanding whether or not those
3 two things meant the same thing. I think the second one
4 that you identified could be an example of the way screen
5 scraping might be implemented. Again, it depends on if
6 there's any specificity associated with the term "screen
7 scraping," which, in the context of the ''676 patent, I
8 don't believe there is. Certainly, not in the claim. It
9 doesn't identify a particular method. It doesn't claim a
10 particular way in which screen scraping should be
11 accomplished.
12 Q You still have Uchida?
13 A I do.
14 Q The one with a "U," Exhibit 1009?
15 A Yes, sir, I have it in front of me.
16 Q You give some opinions about forcing rules in
17 your declaration.
18 Does that ring a bell?
19 A Yes, sir.
20 Q Is there a forcing rule in Uchida?
21 A There is.
22 Q What is the forcing rule in Uchida?
23 A All right.
24 I take that back. I don't believe I've
25 identified a forcing rule from Uchida. I was thinking of

1 Ono. There's a forcing rule in Ono. In Uchida, I'm
2 relying on the combination with Grimshaw. That starts
3 about paragraph 222, and this is going to be Ground 4.
4 Q So in Uchida, I think we had talked about this in
5 a fair amount of detail. So not looking to replow sowed
6 ground, but does Uchida talk about how multiple laptops
7 can be connected to the same projector?
8 A It does.
9 Q And so if you have two laptops, each with their
10 wireless device one, set to the on position with that
11 switch, what determines whose device is displayed using
12 projector 3 in Uchida?
13 A I don't recall if Uchida describes how that
14 scenario could be implemented. But given that scenario, a
15 person of skill in the art would have -- would understand
16 that there has to be some resolution mechanism. And
17 there's a variety of ways in which that resolution
18 mechanism could be implemented. And one example of that
19 is Grimshaw. But whether or not Uchida says more about
20 any kind of resolution and what would happen in that
21 scenario, I don't recall what Uchida specifically says.
22 Q You said one example of that resolution is
23 disclosed -- or described in Grimshaw; is that right?
24 A Yes.
25 Q Could Uchida simply display both laptops' display

1 using the projector?
2 A So you said "simply."
3 Q Sorry. It's fair. Let me take it back. Let me
4 try that at first. I think it would help.
5 Could Uchida display both laptops' display using
6 the projector?
7 A From the perspective of a person of skill in the
8 art, I think that would be one of the design choices that
9 could be implemented. Displaying one, displaying the
10 first one, there's a couple of fairly straightforward
11 design choices that a person of skill in the art would
12 have understood you could implement in the context of
13 Uchida.
14 Q Could the remote control device be tasked with
15 managing the arbitration about which wireless device's
16 display data was being displayed using the projector?
17 A I don't see a reason why that would not also be
18 an obvious design choice.
19 Q Could there be a voting option where all of the
20 users push a button on their wireless device 1 to choose
21 who should display?
22 A I don't see a reason why that wouldn't also be an
23 obvious design choice.
24 Q Would that be a democratic decision?
25 A I think you could call that a democratic

1 decision. And then democracies typically have executives
2 who can override or veto that decision.
3 By the way, since we were in Ground 4, just a
4 quick note, there's a typo in paragraphs 198 and 199 in
5 the rationale to combine.
6 Q Sorry. One second. Let me get there.
7 You said 198 and 199?
8 A Yes.
9 Q What is the typo?
10 A There's references to Ono. Those should be
11 replaced with Uchida.
12 Q Do you know, are the citations still correct?
13 A Ono is 1005. The first one references 1005. I
14 think that's right. I think the cites to 1005, there's a
15 couple of them should not be there. Those are references
16 to Ono. Uchida is 1009, and there should be. Well,
17 the -- the cites are mainly to Deforche and Grimshaw,
18 Deforche being 1030. And then I didn't pull Grimshaw.
19 The Grimshaw is 1008. So those are all correct.
20 Q But the citations to 1005 that are in here that
21 are citations, then, to Uchida --
22 A They're citations to Ono. They should be
23 citations to Uchida.
24 Q Oh.
25 A So paragraph 1 of 198, Uchida discloses similar

1 systems for sending information wirelessly. That should
2 just be the Uchida cite. That's described in the
3 background for Uchida.
4 And then 199, I've also determined that both
5 Uchida and Grimshaw determine that they both disclose
6 buttons or actuators for controlling display of images for
7 users' PCs. That's the Uchida switch. That's described
8 in the limitation-by-limitation analysis. And the example
9 of that is the figure 3 reference. So that should be the
10 figure 3 reference there. And then I think the rest of
11 the cites are the same.
12 Q Got it.
13 Can you go to paragraph 2 for me, page 179? I
14 just want to make sure what your opinion here is. Let me
15 know when you're there.
16 A I'm there.
17 Q So my understanding of the combination that's
18 being proposed here is the same combination that's set
19 forth in 9.D.1 but without any aspect of Deforche; is that
20 right?
21 A That is correct. That is correct.
22 Q Okay.
23 A And the basis for relying on Grimshaw is really
24 set forth.
25 Q In 9.D.1.

1 A In the whole rest of the ground.
2 Q What do you mean "in the whole rest of the
3 ground"?
4 A So just kind of the -- the standard limitation by
5 limitation largely relies on Uchida. And then where
6 there's a reliance on Grimshaw, it's specifically
7 identified in the claim. And then the motivation would
8 either tie back to that general motivation from
9 section 9.D.1, or, for example, in 251, it ties back to
10 the explanation of the limitation specifically.
11 Q And so the only element that's not the preamble
12 that I see that has any citation to Grimshaw is 14F, which
13 is paragraph 257; right?
14 A I believe that is correct.
15 Q And here, we're looking back at limitation 1L
16 and M?
17 A Yes. And that's essentially for the -- the
18 forcing rule component --
19 Q And --
20 A -- that comes from Grimshaw. But there's also --
21 for these limitations, it doesn't mention Grimshaw
22 specifically, but I think there's references back. So
23 within the references back, as an example, paragraph 255
24 mentions Uchida, references limitation 1F. So if there's
25 any discussion in 1F that relies on Grimshaw as a

1 supporting reference, then, you know, that is cross cited.
2 But I think you mentioned this at the outset:
3 It's -- because claim 14 doesn't require the preinstalled
4 generic driver, which I've, in one example, relied on
5 Deforche for that, then that element of the combination
6 doesn't need to be present.
7 Q Does a peripheral device need to be physically
8 connected to a client?
9 A Depends on the claims in the patent. I think, as
10 an example, Claim 1 of the '676 patent just says,
11 "coupling a peripheral device to the processing device,
12 peripheral device having a" wireless transmitter --
13 "transceiver." I thought there was some claim of some
14 patent that mentions physicality as part of the coupling.
15 But I don't see that in '676, Claim 1, unless I'm missing
16 something.
17 Q And is it your understanding that that wireless
18 transmitter of the peripheral device is for the coupling
19 of the peripheral device to the processing device?
20 A You said "it's for the coupling"?
21 Q Or able to do?
22 A Typically, the wireless transceiver is the
23 wireless component that does the wireless transmitting and
24 receiving. The -- the coupling is an example, and the
25 context of the prior art is the -- the USB interface --

1 physical interface of the peripheral device sliding into
2 the USB receptor of the processing device. So I --
3 it's -- the wireless transceiver could be a component of
4 the peripheral device, but I don't think it -- it's the
5 thing that's doing the coupling physically between the
6 peripheral device and the processing device. And as an
7 alternative to the word "physically," it's the -- the
8 mating portion.
9 Q Have you ever come across a device that you would
10 consider to be a peripheral device that was a wireless --
11 wirelessly connected to a client?
12 A Using those terms broadly, I think yes. I think
13 you could consider a wireless mouse to be a peripheral to
14 a computer.
15 Q Are there wireless mice that don't require a USB
16 transceiver to be plugged into a USB port?
17 A I suspect there are.
18 Q Have you ever used one?
19 A I suspect I have.
20 Q When?
21 A I don't recall. Wireless mice have been around
22 for a long time. And I don't know that they require USB
23 to do so. I have a Mac now that's got a wireless mo- --
24 mouse. It doesn't have a -- I don't think it uses USB.
25 MR. HALVERSON: Why don't we take two minutes? I

1 think I'm done or almost done with this.
2 THE WITNESS: Okay.
3 THE STENOGRAPHER: Off the record at 9:05 a.m.
4 (Off the record.)
5 THE STENOGRAPHER: Back on the record at
6 9:21 a.m.
7 MR. HALVERSON: Dr. Almeroth, pending anything
8 from your counsel, Mr. Yang, I have nothing else today.
9 MR. YANG: I have no questions. Thank you,
10 Dr. Almeroth.
11 THE STENOGRAPHER: Off the record at 9:21 a.m.
12 (Time noted 9:21 a.m.)
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1)
STATE OF CALIFORNIA)
2)

3
CERTIFICATE OF REPORTER
4

5 I, JUSTYNE N. JOHNSON, do hereby certify that the
6 witness in the foregoing deposition was by me duly
7 affirmed to tell the truth, the whole truth and nothing
8 but the truth in the within-entitled cause; that said
9 deposition was taken at the time and place therein stated;
10 that the testimony of said witness was reported by me and
11 was thereafter transcribed under my direction and
12 supervision; that the foregoing is a full, complete and
13 true record of said testimony; that the witness was given
14 an opportunity to read and, if necessary, correct said
15 deposition and to subscribe the same.
16 I further certify that I am not of counsel or
17 attorney for any of the parties in the foregoing
18 deposition and caption named, or in any way interested in
19 the outcome of the cause named in said caption.
20 IN WITNESS WHEREOF, I have hereunto set my hand
21 this 2nd day of July, 2025.
22
23 Justyne Johnson
24 JUSTYNE N. JOHNSON, CSR NO. 14301
25

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