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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.,	)	U. S. PATENT NO. 11,403,237
	)	
Petitioners,	)	IPR2024-01437
	)	
vs.	)	
	)	
BARCO N. V. ,	)	
	)	
Patent Owner.	)	

TESTIMONY CONCERNING PATENT 11,403,237

ORAL DEPOSITION OF
MICHAEL C. BROGIOLI, PH.D.
SEPTEMBER 9, 2025

ORAL DEPOSITION OF MICHAEL C. BROGIOLI, PH.D.,
produced as a witness at the instance of the
Defendants and duly sworn, was taken in the above
styled and numbered cause on Tuesday, September 9,
2025, from 12:59 p.m. to 1:34 p.m., before TAMARA
CHAPMAN, CSR, RPR-CRR in and for the State of Texas,
reported by computerized stenotype machine, at the
offices of K&L Gates, 2801 Via Fortuna, Austin,
Texas, pursuant to the Federal Rules of Civil
Procedure and any provisions stated on the record
herein.

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1	I N D E X	
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11	(No new exhibits were marked during the deposition.)	
12	PREVIOUSLY MARKED EXHIBITS	
13	NO.	PAGE
14	Exhibit 1027	4
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1 MICHAEL C. BROGIOLI, PH.D.,
2 having been first duly sworn, testified as follows:
3 EXAMINATION
4 BY MR. GREENLEAF:
12:59 5 Q. So, Dr. Brogioli, we just finished up the
6 deposition for the '002 patent in IPR 2024-01436.
7 This is now the deposition for IPR 2024-01437 for
8 the U.S. Patent No. 10,762,237.
9 So do you have the Kaplan reference,
01:00 10 Exhibit 1027?
11 A. Okay.
12 Q. And Kaplan discloses using USB mass
13 storage device class, doesn't it?
14 A. That is right. It discusses USB and
01:00 15 also, as you just said, the mass storage class of
16 devices.
17 Q. And so the transmitter 120 appears to the
18 computer 220 as a mass storage device. Correct?
19 A. That -- the transmitter 120, yes, it's
01:01 20 described and appears -- it has the mass storage
21 device there.
22 Q. And how would the transmitter appear as a
23 mass storage device to the PC?
24 MR. HALVERSON: Objection; form.
01:02 25 A. I guess -- just searching around in

1 Kaplan real quick.

2 So in paragraph, I guess, 60 of Kaplan it
3 makes mention of different states of operation of a
4 transceiver. It mentions things such as dismounting
01:02 5 about five lines down. So I guess Kaplan may
6 contemplate that the -- the device would be
7 mounted -- mounted in terms of file system to appear
8 as storage.

9 Q. What are some ways that the operating
01:03 10 system could mount the device in terms of the file
11 system to appear as storage?

12 A. As I recall, it would use various
13 functionality, probably from the operating system,
14 to mount a file system so that the device would
01:03 15 appear to the operating system.

16 Q. Could one method be to use the mass
17 storage device driver for USB in the Windows
18 operating system?

19 A. I'm just scanning back through my
01:04 20 declaration.

21 (Pause.)

22 I would need to go back and look at -- to
23 your question about the mass storage driver and
24 see -- I don't remember from memory or from names
01:04 25 what the various API calls that are in there.

1 Q. In where?

2 A. In -- that -- my understanding was you
3 were asking about that device driver.

01:05 4 Q. Yeah. My question was is one method to
5 have the transmitter appear as a mass storage device
6 to the PC would be to use the USB mass storage
7 device driver?

01:05 8 A. To the extent the device was being
9 mounted on this PC through a USB connection using
10 the mass storage driver, the driver would certainly
11 be part of that.

12 Q. Are there other methods for connecting
13 USB storage devices to a computer than using the USB
14 mass storage device driver?

01:06 15 A. I would say when going through a modern
16 operating system, if we're talking USB-based mass
17 storage classification devices, that's generally the
18 best practice way to do it, or how people are
19 instructed for a given operating system.

01:06 20 Q. And then Kaplan talks about dismounting
21 the mass storage device and then the transmitter
22 would appear differently to the operating system.

23 Correct?

01:07 24 A. That seems to be what Kaplan talks about
25 in Paragraph 60, where the dismount or eject is done

1 that -- that device doesn't show up as a mass
2 storage device any longer.

3 Q. And what would the transmitter then
4 appear to the operating system as after the mass
01:07 5 storage device was dismounted or ejected?

6 A. I don't recall Kaplan -- I don't recall
7 my talking about what Kaplan says about that, as to
8 whether it's connected somehow differently or
9 mounted somehow differently, and what that would
01:07 10 look like.

11 Q. So Paragraph 51 says that: The
12 transmitter 120 may eject itself, ceasing to
13 function as a mass storage device and may begin
14 operation as a wireless transceiver in communication
01:08 15 with the receiver 110.

16 Do you see that?

17 A. Yes.

18 Q. And Deforche discloses a similar wireless
19 transceiver connected to a USB port. Correct?

01:08 20 MR. HALVERSON: Objection; form.

21 A. So Deforche talks about the USB device
22 which connects to the system without the need for a
23 proprietary software or driver. In Deforche, the
24 USB device contains a modem.

01:09 25 Q. And Paragraph 33 of Deforche talks about

1 how the modem can use the USB HID protocol.

2 Correct?

3 A. You said Paragraph 34?

4 Q. 3. 33.

01:09 5 A. Can I hear your question one more time?

6 Q. Deforche discloses using the USB HID

7 protocol to allow the transmitter to communicate

8 with the PC in Paragraph 33. Correct?

9 A. That looks right, where Deforche says

01:10 10 that the USB -- or that the TCP/IP static is

11 configured to send the IP data through Deforche's or

12 its previous mention of the USB HID channel.

13 Q. So you testified earlier that you don't

14 recall Kaplan disclosing how the transmitter would

01:11 15 appear to the operating system after the mass

16 storage device was ejected. Correct?

17 A. That I don't recall discussing that in my

18 declaration or to the extent Kaplan discusses that,

19 I don't recall from memory discussing that section

01:11 20 of Kaplan.

21 Q. Okay. But you're also, sitting here

22 today, unaware of any disclosure in Kaplan that

23 talks about how the transmitter would appear to the

24 operating system after the mass storage device was

01:11 25 ejected. Correct?

1 A. That's correct. It's something I haven't
2 thought about, at least today.

3 Q. But based on Deforche, one way that we
4 know post modem interface can be connected to a PC
01:12 5 is via a USB HID interface. Correct?

6 A. It looks like Deforche is talking about,
7 at least in Paragraph 33, that that host modem
8 interface here can use that USB HID protocol. I
9 don't see that it's necessarily saying, quote, how
01:12 10 it shows up to the computer all that specifically.

11 MR. GREENLEAF: All right. Let's go
12 off the record. I don't think I have too much more.

13 (Break.)

14 Q. So, Dr. Brogioli, you understand that the
01:31 15 person of ordinary skill in the art we've been
16 talking about today is from the perspective of
17 somebody who existed hypothetically in 2001, which
18 is the priority date of these patents.

19 Correct?

01:32 20 MR. HALVERSON: Objection; form.

21 A. The priority date of the '237 I think you
22 said was 2001?

23 Q. 2011.

24 A. Yes. So that would be the date for this
01:32 25 person of skill in the art, yes.

1 Q. Okay. And earlier you testified -- I
2 asked you the question about whether there are other
3 methods for connecting USB storage devices to a
4 computer other than using the mass storage device
01:32 5 driver. And you said generally the way people --
6 let's see here. Well, let me scratch that question.

7 So different question I asked: Is one
8 method to have the transmitter appear as a mass
9 storage device to the PC would be to use the USB
01:33 10 mass storage device driver. You said to the extent
11 it was being mounted on the PC using a USB
12 connection, the mass storage device driver would
13 certainly be a part of that.

14 And then I asked you about other methods.
01:33 15 And the transcript is not super clear about this,
16 but are there other ways of connecting, say, a mass
17 storage device in the just general sense of the term
18 as a storage device to a PC other than using the USB
19 mass storage device driver?

01:34 20 MR. HALVERSON: Objection; form.

21 A. I would say a company could go implement
22 their own driver and connect to that device if they
23 wanted to, certain design criteria they had.

24 MR. GREENLEAF: Okay. No further
01:34 25 questions. Any redirect, Mr. Halverson?

1 MR. HALVERSON: No. Nothing from me.

2 MR. GREENLEAF: Okay. Thank you.

3 We'll meet up tomorrow.

4 (Deposition concluded at 1:34 p.m.)

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1	CORRECTION PAGE			
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SIGNATURE PAGE

I, MICHAEL C. BROGIOLI, PH.D., have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted on the correction page.

MICHAEL C. BROGIOLI, PH.D.

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

YEALINK (USA) NETWORK
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Petitioners,

vs.

BARCO N. V.,

Patent Owner.

U. S. PATENT NO. 11,403,237

IPR2024-01437

REPORTER'S CERTIFICATION
DEPOSITION OF MICHAEL C. BROGIOLI, PH.D.
TAKEN SEPTEMBER 9, 2025

I, TAMARA CHAPMAN, Certified Shorthand Reporter in
and for the State of Texas, hereby certify to the
following:

That the witness, MICHAEL C. BROGIOLI, PH.D., was
duly sworn by the officer and that the transcript of
the oral deposition is a true record of the
testimony given by the witness;

That the original deposition was delivered to
KEVIN GREENLEAF;

That a copy of this certificate was served on all
parties and/or the witness shown herein on

_____.

I further certify that pursuant to FRCP No.
30(f)(i) that the signature of the deponent:

1 X was requested by the deponent or a party
2 before the completion of the deposition and that the
3 signature is to be returned within 30 days from date
4 of receipt of the transcript. If returned, the
5 attached Changes and Signature Page contains any
6 changes and the reasons therefor;

7 was not requested by the deponent or a party
8 before the completion of the deposition.

9 I further certify that I am neither counsel for,
10 related to, nor employed by any of the parties in
11 the action in which this proceeding was taken, and
12 further that I am not financially or otherwise
13 interested in the outcome of the action.

14 Certified to by me this 23rd day of September, 2025.
15
16
17
18

19 

20 Tamara Chapman, CSR, RPR-CRR
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