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: IPR2024-01438

U.S. PATENT NO. 11,258,676

PATENT OWNER'S MOTION TO SUBMIT SUPPLEMENTAL INFORMATION

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	Reserved
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)*
PROP. Ex. 2035	Declaration of D. Cai dated Jan. 12, 2026, filed in *Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al,* 2:23-cv-00521 (E.D. Tex.) on January 20, 2026, in support of Yealink's Motion for Compulsory License
PROP Ex. 2036	Yealink's Motion for Compulsory License filed in *Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al,* 2:23-cv-00521 (E.D. Tex.) on January 20, 2026

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.123(b), Patent Owner Barco NV hereby moves to submit Proposed Exhibit 2035, the sworn declaration "under penalty of perjury" of Dunxiong Cai and Proposed Exhibit 2036, Yealink's Opposed Motion for Compulsory License, that Yealink filed accompanying Mr. Cai's Declaration. Barco was authorized to submit this Motion at the January 21, 2026 hearing. The Board also requested the parties provide their respective positions regarding papers to address this evidence if Patent Owner's Motion is granted.

Barco's Motion should be granted because Yealink previously represented to the Board that "Yealink ceased selling dongles in the U.S.," in an attempt to minimize the importance and value of Barco's patented inventions, and Proposed Exhibits 2035 and 2036 are evidence that Yealink's prior statements regarding the value of Barco's patent inventions are false and contradicted by the fact Yealink now expressly seeks a compulsory license to the patent in this proceeding. *See* Proposed Exhibit 2035 at 3 ("Yealink *has decided* to reintroduce its WPP30 in the United States, and *will resume selling* its WPP30 dongle in 2026") (emphasis added); Proposed Exhibit 2036 at 1 ("Yealink has decided to reintroduce the WPP30 to the U.S. market in 2026. Because the parties have been unable to agree on an appropriate ongoing royalty for the WPP30 upon reintroduction, Yealink

respectfully requests that the Court determine the ongoing royalty before entering final judgment, and set the ongoing royalty to $54, maximum, per WPP30 sold.”).

II. ARGUMENT

A. Barco’s Request is Timely

Barco submitted its request for authorization to file this motion on January 16, 2026, three days after these two proposed exhibits were filed under seal with the court in Texas.[1] Before these pieces of evidence were submitted to the Texas court, there was no evidence for Barco to submit to the Board, and Barco was *not aware* Yealink had “decided to reintroduce the WPP30 to the U.S. market in 2026”, so this request could not have been made earlier. The seven days between the submission of the sealed version of these exhibits and the public versions which are Proposed Exhibits 2035 and 2036 are of minimal impact to the timeliness of Barco’s request.

That this information arose so close to the hearing is also irrelevant as the PTAB may permit supplemental information post-hearing. *See, e.g.*, *Valve Corp. v. Ironburg Inventions Ltd.*, IPR2016-00948, Paper 37 (P.T.A.B. July 6, 2017). Finally, both Barco and Yealink have an obligation to submit this information, which

[1] Barco submits the publicly filed version of the Proposed Exhibits from January 20, 2026. Sealed versions were filed in District Court on January 13, 2026.

"is inconsistent with a position advanced by [Yealink] during the proceeding[.]" *See* 37 C.F.R. 42.51(b)(1)(iii); 37 CFR § 42.11.

As the Trial Practice Guide states, although the oral hearing has now passed, given this proceeding is not close to the one-year deadline and given the request to submit this supplemental information was made shortly before the hearing, Patent Owner submits its request is timely. *See* Trial Practice Guide at 48.

B. Barco's Request is in the Interests-of-Justice

Yealink represented to the Board that it had "ceased selling dongles in the U.S." in an effort to minimize the importance and value of both the dongle products and Barco's patented technology. *See* Paper 23 at 28. Yealink's decision to reintroduce its WPP dongles in the U.S. and to seek a license to the patent challenged in this proceeding is inconsistent with that representation and a ground to grant motions for supplemental information. *Instrumentation Lab. Co. v. Hemosonics LLC*, No. IPR2017-00852, Paper 36 at 7 (P.T.A.B. July 11, 2018) (granting motion based on inconsistencies between the arguments). Yealink has attempted to argue that Barco's patents, including the one challenged in this proceeding, have no value. Yealink does this by arguing that Yealink did not need its WPP dongle products in the market. Yealink also argued that Barco's evidence of secondary considerations are deficient and not probative under *Ancora Techs., Inc. v. Roku, Inc.*, No. 2023-1674, 2025 WL 1679967, at *7 (Fed. Cir. June 16, 2025).

Yealink's request for a compulsory license to the very patent Yealink contends is obvious (Proposed Exhibit 2035 and 2036) directly contradicts Yealink's position with regard to not only the Crestron license, but also its argument that Barco's patented technology is of little value. Proposed Exhibit 2036 at 1.

Proposed Exhibit 2036 is a request that the trial court order a compulsory license, over Barco's objections, specific to certain Asserted Patents, which includes the patent challenged in this proceeding and the other patents argued in the January 21, 2026, hearing. That Yealink seeks a compulsory license to only six patents, and proposes paying $54 per unit for a compulsory license to only the six Asserted Patents in the litigation, is additional evidence of the non-obviousness of Barco's patents. *See generally* Proposed Exhibit 2036. Yealink's compulsory license request further bolsters the secondary consideration of non-obvious as also evidenced by the Crestron license as it relates to licensing and acquiescence of those in the industry. Ex. 2011. Moreover, Yealink alleged the Crestron license is inapplicable because it covered more than the patents in these proceedings. However, Yealink's request for a license is limited to the patents Yealink contends are obvious. Proposed Exhibit 2036 at 5 ("the hypothetical license in this case include only six U.S. patents across two families").

To ensure Yealink cannot make further inconsistent arguments and inconsistent positions regarding its desire to obtain a license and sell its WPP

products that it admits infringe the challenged patent, Proposed Exhibits 2035 and 2036 should be included in the record. Patent Owner also requests both parties be permitted to submit a brief 5-page paper to explain the applicability of the evidence to the obviousness case that Petitioner advances in this proceeding. *Instrumentation Lab. Co. v. Hemosonics LLC*, No. IPR2017-00852, Paper 36 at 7 (P.T.A.B. July 11, 2018) (granting motion based on inconsistencies between the arguments made in different proceedings).

III. CONCLUSION

For the above reasons, Patent Owner requests that Proposed Exhibits 2035 and 2036 be added to this proceeding and a short 5-page paper be provided to each party to address the two Proposed Exhibits. Patent Owner and Petitioner have conferred, and Patent Owner can provide such a paper within one week of an order on these two exhibits and Petitioner can provide its response within one week of Patent Owner's paper.

Respectfully submitted,

Dated: January 28, 2026

By: /*Erik Halverson*/

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 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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