

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 IPR2024-01439
Patent No. 11,422,951

**PATENT OWNER'S PRELIMINARY RESPONSE
UNDER 37 C.F.R. § 42.107**

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Ex. 2001	Excerpt from File History of Ex Parte Reexamination 90/014,087
Ex. 2002	WIPO Publication WO 2010105335 (“Banerjee”)
Ex. 2003	U.S. Publication US 20100302454 (“Epstein”)

I. INTRODUCTION

U.S. Patent 11,422,951 (“the ‘951 patent”) “relates to electronic tools for meetings including methods or devices for providing connection to a communications network, to networks or methods of operating the network, methods or devices for use in displaying media content.” Ex. 1001 at 1:17-22. Specifically, the ‘951 patent’s inventors provided “solutions to three major problems with meetings: a) the time taken to prepare for a meeting. This is mainly achieved by allowing “on-the-fly” presentation of any displayable information. This information does not have to be linked into any particular presentation software, nor to be compatible with any such presentation software, b) the time taken to conduct the meeting using electronic meeting tools. This is achieved by reducing the time to connect computers to the display or projection system. c) the time taken to reflect and review and document the meeting afterwards. This is achieved by providing the possibility of recording the course of the meeting in the same time sequence that it was carried out as well as be able to store all data presented and who presented it.” Ex. 1001 at 13:41-55.

Yealink (USA) Network Technology Co., Ltd. and Yealink Network Technology Co., Ltd. (“Petitioners”) petitioned for *Inter Partes* Review (“IPR”) of

the ‘951 patent challenging Claims 1-11 and 12-21 (“the Challenged Claims”).

Pursuant to 37 C.F.R. §42.107(a), Barco N.V. (“Patent Owner”) submits this Preliminary Response.

Petitioners have submitted proposed grounds for challenge based on obviousness. However, for each proposed ground, at least one claim element is missing from the combination of references. In addition, one of ordinary skill in the art would have no motivation to modify the references as proposed by Petitioners. Thus, Petitioners failed to meet their initial burden to show that each element of the claims was known, and that the claims are obvious. Accordingly, the Board should conclude that the information presented in the Petition and accompanying evidence do not establish a reasonable likelihood that Petitioners will prevail with regard to any claim. Thus, the Board should deny institution of all grounds asserted in the Petition. Furthermore, since several factors weigh against institution by the Board, the Board in exercising its discretion should deny institution of the IPR.

II. THE ‘951 PATENT

The ‘951 patent improves upon the prior art by providing “solutions to three

major problems with meetings: a) the time taken to prepare for a meeting. This is mainly achieved by allowing “on-the-fly” presentation of any displayable information. This information does not have to be linked into any particular presentation software, nor to be compatible with any such presentation software, b) the time taken to conduct the meeting using electronic meeting tools. This is achieved by reducing the time to connect computers to the display or projection system. c) the time taken to reflect and review and document the meeting afterwards. This is achieved by providing the possibility of recording the course of the meeting in the same time sequence that it was carried out as well as be able to store all data presented and who presented it.” Ex. 1001 at 13:41-55.

In 2011 (the priority date of the ‘951 patent), there were many problems for holding a face-to-face meeting. Ex. 1001 at 4:41-42. For example, there was complexity of the networking infrastructure; high demands on technical expertise of users in systems that are supposed to be designed to support everyday use by the non-expert user; barriers to the use of complicated technology in meetings; great variety of possible collaborative software solutions—none of which seems to solve the fundamental problems of holding successful meetings; meetings being boring or annoying for members of the meeting; complexity of firewalls and other

security measured employed in corporate networks; lack of, or restriction of participation by members of a meeting, time taken to prepare presentations for meetings. *Id.* at 4:43-60.

The inventors of the '951 patent developed a remedy to the prior art problems in which “The present invention has the advantage of scalability. It can provide a display system for use by a plurality of users in meetings. Every user in the meeting thus can have a client processing device 31 for coupling to a connection unit 47. A first user action connects the client processing device 31 to the base node 36, e.g. by inserting a connection unit 47 into the relevant interface connector on the processing device 31, e.g. a USB interface. A second user action comprising activating a button or key on the input device (e.g. by depressing it) then starts the process of transmitting arbitrary media content from the client processing device 31 to the base node 36. This process preferably includes screen scraping data from the processing device. Using screen scraping avoids special programs being installed on the base node 36 to carry out graphical commands sent from the processing device 31. When the base node 36 receives the plurality of arbitrary media content, it can allow auto composition of this media content on the central display connected to it.” *Id.* at 17:53-18:3.

Regarding operating details, the '951 patent explains that "The input device 48 allows a user interaction with the connection unit 47. Preferably the input device 48 is physical actuator coupled to the connection unit 47. The user action applied to the input device 48 generates a signal that can trigger transfer of data from the processing device 31 (to which the connection unit 47 is coupled) to the network 50." *Id.* at 16:30-35. For example, the '951 patent teaches that "When the user at the computer (C) wants to show her content, she presses the button (9). When the button was previously in state "connected" (see FIG. 6), it will check the state of the base unit (P). If the base unit is not in state "full", the peripheral device will send the screen scraped arbitrary media content to the base unit (B), which will add the media content to the composition on the central display. The peripheral device LED (10) now turns red to indicate "showing" state (FIG. 6). The button (9) acts as a toggle. When the user presses the button again, that computer displays content will be removed from the projector. The LED (10) goes back to white." *Id.* at 22:42-54.

For example, during reexamination of U.S. patent 8,756,348, which is the parent to the '951 patent, the Examiners found that "the claim limitations recited in claim 1 are deemed patentable over the prior art of record having raised the

substantial new question of patentability as the prior art fails to teach or suggest that actuating the actuator to trigger the processing device to transfer said user selected arbitrary media content to said wireless transmitter through said port to transmit said user selected arbitrary media content to the node configuration via the communications network” and “the claim limitations recited in claim 12 are deemed patentable over the prior art of record having raised the substantial new question of patentability as the prior art fails to teach or suggest that the triggering comprises actuating the actuator on the peripheral device to send a signal to the processing device to trigger the processing device to wirelessly transfer said user selected arbitrary media content to said wireless transmitter through said port to transmit said user selected arbitrary media content to the display node via the communications network.” Ex. 2001 at 7-8.

Similarly, the claims of the ‘951 patent are directed to various aspects of electric meeting tools that have the advantage of scalability. For example, every user in the meeting can have, for example, a client processing device for coupling to a peripheral device, in which a first user action connects the client processing device to the base node, e.g. by inserting a peripheral device into the relevant interface connector on the processing device, e.g. a USB interface, and a second

user action comprising activating a button or key on the input device (e.g. by depressing it) starts the process of transmitting arbitrary media content from the client processing device to the base node. *See* Ex. 1001 at 17:53-64.

Independent Claim 1 specifically requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device.” Ex. 1001 at 27:62-28:2. Independent Claims 9, 16, and 21 respectively also require the use of the input device. *Id.* at 28:42-67; 29:30-47; 30:14-45. By virtue of dependency, the remaining challenged claims likewise require the use of the input device.

III. CLAIM CONSTRUCTION

In an *inter partes* review proceeding, a claim of a patent shall be construed using the same claim construction standard that would be used to construe the claim in a civil action. *See* 37 C.F.R. § 42.100(b); *Phillips v. AWH Corp.*, 415 F.3d 1303, 1312-13 (Fed. Cir. 2005). Under *Phillips*, claims must be construed so as to sustain their validity, if possible. The specification is the “best source for

understanding a technical term,” to be supplemented, “as needed, by the prosecution history.” *Id.* at 1315.

Patent Owner reserves the right to assert alternative claim constructions to those proposed by Petitioners, and to provide constructions for those terms that Petitioners have not construed, should any trial be instituted. For only the purposes of this Preliminary Response, Patent Owner relies on Petitioners’ claim construction.

IV. OVERVIEW OF CITED ART

A. Overview of Ono

Ono states that “it was difficult to select, from the side of the projector, an information terminal apparatus from among a plurality of information terminal apparatuses on the side that sends the image.” Ex. 1005 at [0006]. As such, Ono “seeks to provide an image display apparatus and image display method that are capable of switching among a plurality of networked information terminal apparatuses and selecting a desired information terminal apparatus therefrom, and of displaying on a display section image information from the desired information terminal apparatus.” *Id.* at [0007].

For example, Ono states that “The three information terminal apparatuses 2A, 2B and 2C may be, for example, personal computers (PCs). Communications modules 44A, 44B and 44C, such as wireless connection modules, are also attached to the body of the information terminal apparatuses 2A, 2B and 2C, respectively, via a slot. These communications modules 44A, 44B and 44C are also used for transmitting and receiving request signals, response signals, rejection signals and the like for the connection and disconnection of communications with the communications module 40 of the projector 60. In addition, they are also used for transmitting image information to the projector 60.” *Id.* at [0039]. Ono further describes that “by simply inserting the plurality of USB memories 45, which are included at the time of purchase, into the respective USB jacks of the plurality of information terminal apparatuses 2A, 2B and 2C, carrying out a predetermined installation operation, and inserting the plurality of wireless connection modules 44 into the respective other USB jacks, the user of the image display apparatus 1 may connect the image display apparatus 1 and the plurality of information terminal apparatuses 2A, 2B and 2C to the wireless network.” *Id.* at [0062].

Additionally, Ono describes that “the remote controller 69 is capable of controlling, through remote operations and through the image display apparatus 1,

the fast forwarding/rewinding of the image displayed on the display section of the selected and connected information terminal apparatus 2. In this case, too, when the projector 60 of the image display apparatus 1 receives the infrared remote control signal from the remote controller 69 through the remote control optical receiver section 68, the CPU 61 references, for example, the table, which is stored in the ROM 63 or the RAM 64, for interpreting the remote control signals and interprets the command, the CPU 61 generates the respective transmission control data corresponding to the command, and sends the respective transmission control data from the wireless connection module 40 to the wireless connection module 44 of the information terminal apparatus 2 via the I/F 66.” *Id.* at [0070]. That is, Ono describes that “through operations using the remote controller 69 and with respect to the projector 60 of the image display apparatus 1, the image display system 10 is capable of switching among a plurality of information terminal apparatuses connected to a network and selecting the desired information terminal apparatus therefrom, and of displaying on a display section image information from the desired information terminal apparatus.” *Id.* at [0144]. In other words, Ono is directed to an image display system that wirelessly connects one or more laptops to a projector and that is capable of, from the side of the image display

apparatus, switching among the plurality of networked information terminal apparatuses by using a remote controller.

B. Overview of Corbett

Corbett describes that “not all devices have a USB port. To transfer stored data to an external device not compatible with the USB protocol, the USB flash drive may include a transmitter capable of transmitting data from the USB flash drive directly to an external device.” Ex. 1007 at [0006]. For example, Corbett states that “The transmitter may transmit a modulated data signal and/or may transmit the data wirelessly, e.g., without a direct physical connection between the USB flash drive and the external device 150. The transmitter may directly transmit data.” *Id.* at [0020]. Corbett further states that “transfer of data through the transmitter 122 may be initiated through selection of one or more selectors 130 of the USB flash drive. For example, as shown in FIG. 1, the USB flash drive 100 may include a transmission initiation selector 134, such as a button, selector wheel, and the like. Upon selection of the transmission initiation selector, the transmitter 122 may transmit all or a portion of the data stored in the computer readable medium 112 to the external device 150.” *Id.* at [0023]. Corbett also describes “One example method 200 of transmitting data from a USB flash device

is illustrated in FIG. 2 with reference to the example USB flash drive of FIG. 1.

Initially, data is stored 210 in the nonvolatile computer readable medium of the USB flash drive 100 shown in FIG. 1. The data portion to be transmitted may be selected 212.” *Id.* at [0029]. That is, while Corbett describes a USB flash drive, Corbett is specifically directed to a USB flash drive that may transmit data from the computer readable medium to an external device for secure exchange of data.

C. Overview of Uchida

Uchida describes “an image projection system including an image projection device having a wireless unit that receives image data transmitted by wireless communication from an external computer device and projects an image corresponding to the image data, and a remote control device that remotely controls the operation of the image projection device, and a device that can be communicatively connected to both the computer device and the remote control device, wherein the remote control device has a wireless setting information generating means for generating the wireless setting information required for wireless communication between the image projection device and the computer device.” Ex. 1009 at [0013]. For example, Uchida states that “The computer

device 4 connects the USB connector 105 (see FIG. 3) described below in the wireless device 1, so that the wireless device 1 functions as a wireless unit and transmits image data to the image projection device 3 via the wireless device 1.”

Id. at [0039]. Uchida further states that “When this USB connector 105 is connected to the remote control device 2, it is controlled by the CPU 101 so that wireless setting information can be written to the flash memory 104 from the remote control device 2. In addition, when the USB connector 105 is connected to the computer device 4, the CPU 101 controls the wireless setting information written in the flash memory 104 so that it can be read by the computer device 4.”

Id. at [0067]. Uchida also states that “The wireless communication unit 107 has an antenna 110, an RF unit 111, and a baseband unit 112, and is capable of transmitting and receiving data based on the wireless LAN standard.” *Id.* at [0068].

Uchida further describes that “The image transfer stop switch 140 is a slide switch that serves as an image transmission stop operation unit for instructing the image projection device 3 to stop transmitting the image data, and is a changeover switch that switches between an image stop ON mode and an image stop OFF mode. When the image transfer stop switch 140 is operated to the image stop ON

mode side while connected to the computer device 4 via the USB connector 105, the CPU 101 notifies the computer device 4 of this information. When the CPU 405 of the computer device 4 receives the information, it executes an image transfer application and transmits a request to the image projection device 3 via the wireless communication unit 107 to project a specific image (here, a black screen image) on the image projection 50 device 3.” *Id.* at [0071].

That is, Uchida only generally describes a USB device with a wireless transmitter to send image data from a computer to a projector, in which the USB device has an on/off button.

D. Overview of Grimshaw

Grimshaw is directed to “an exemplary communication system 10 that includes a number of hardware components integrated with a conference table, although they could be integrated in any number of other pieces of furniture instead.” Ex. 1008 at [0012]. Grimshaw states that the “Control module 12 generally acts as an information hub for communication system 10 and exchanges information with the other hardware components in the system. Control module 12 may be mounted inside table 26, underneath the tabletop surface (as illustrated in FIG. 2), on top of the tabletop surface, or elsewhere.” *Id.* at [0013]. Grimshaw also

states that “separate laptop computers are connected to each of the user modules 14-20 (each user module has one or more data ports), but an operator has engaged button 344 on user module 14 because they wish to take control of display module 22.” *Id.* at [0020]. Grimshaw further states that “if a user presses or otherwise engages button 344 on user module 14, then communications system 10 (more specifically, controller 324 and switch controller 318) gives control of display module 22 to user module 14. Thus, if the user has a laptop computer plugged into a data port on user module 14, the video and/or data signals from that computer are sent to display module 22 so that all meeting attendees can see what is on that particular computer. Likewise, audio, video and/or data signals may be sent to an outside network via network connection 390, so that remote meeting attendees may follow along as well. If, following the activation of button 344, a different user were to press button 354 on user module 16 then control would pass to that user module instead.” *Id.* at [0027].

That is, Grimshaw is directed to a central switching module that switches based on user module interactions, in which the user modules are integrated in furniture, e.g., having button and connectivity for A/V input.

E. Overview of Ichieda

Ichieda is directed to “an image display device, an image display system, and a network connection method allowing the user to easily perform the procedures for establishing the network connection to the image display device such as a projector.” Ex. 1006 at [0008]. Specifically, Ichieda describes that the “information terminal 80 is arranged to supply (transmit) an image signal to the projector 50 in a condition which the network connection (wireless LAN connection) with the wireless LAN is established between the information terminal 80 and the projector 50.” *Id.* at [0044].

Ichieda further states that “As shown in FIG. 11, the image display system 1 of the present embodiment provided with a projector 50... and a laptop type of personal computer 90 (hereinafter referred to as a laptop PC) provided with an information terminal 80 connected thereto as an image supply device.” *Id.* at [0129]. Ichieda discloses that “The laptop PC 90 is provided with a control section 91, a hard disk drive 92, an operation section 93, a display section 94, and the interface (I/F) section 95, and the interface section 95 is provided with a communication section 96 and a USB port 97.” *Id.* at [0132]. Ichieda also states that “When the message described above is displayed, in the condition in which the connection information code C is protected from the projector 50 to the screen SC (step S104),

the user is requested to set the information terminal 80 to the camera mode and shoot (record) one of the projected connection information codes C.” *Id.* at [0143].

That is, Ichieda is directed to providing connectivity details for a wireless projector, e.g., via QR code, in which terminals, such as, mobile-phone like devices can scan the QR code and setup connection, while the communication section is in the personal computer.

V. ARGUMENT

Petitioners must establish a reasonable likelihood of prevailing with respect to at least one of the claims challenged in the petition to support institution of an IPR. *See* 35 U.S.C. § 314(a); see also 37 C.F.R. § 42.108(c). Petitioners have not shown a reasonable likelihood of prevailing since the Petitioners failed to show that any of the cited art, alone or in combination, discloses or suggests the same combination of features of the independent claims. Specifically, Petitioners have not established that the combination of the teachings of the cited references discloses or suggests: 1) an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the

wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device, as required by independent Claim 1; 2) an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and via the wireless communications network to the base node for display on the first display, as required by independent Claim 9; 3) triggering transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless communications network and to the base node for displaying said user selected arbitrary media content on the first display, the input device being a physical actuator coupled to the peripheral device, as required by independent Claim 16; and 4) an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content of said user processing device to said transmitter on the at least one peripheral device through said port, and from the transmitter to the wireless communications network to the base node of the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device, as required by independent Claim 21.

A. Applicable Law

1. Obviousness

Obviousness is a question of law based on the underlying factual determinations, including: (A) determining the scope and content of the prior art, (B) ascertaining the differences between the claimed subject matter and the prior art, and (C) resolving the level of ordinary skill in the art. *Graham v. John Deere Co.*, 383 U.S. 1, 17–18 (1966). A claim is unpatentable if “the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 406 (2007) (quoting 35 U.S.C. § 103).

“[A] patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *Id.* at 418.

B. Ground I is deficient with regard to Claims 1-4, 6-11, 13-21 because the alleged combination fails to disclose or suggest the input device, as required by Claims 1, 9, 16, and 21

Petitioners allege in Ground I of the petition that a combination of the teachings of Ono and Corbett teaches the input device and triggering transfer of said user selected arbitrary media content, as required by independent Claims 1, 9, 16, and 21. Petition at 31-33, 43-45. Petitioners, however, have failed to demonstrate how the teachings of Ono and Corbett, taken alone or in combination, disclose or suggest the same combination of features as recited in Claims 1, 9, 16, and 21.

1. Claims 1, 9, and 21

Claim 1 requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device,” while Claim 9 similarly requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the

transmitter to the wireless communications network and via the wireless communications network to the base node for display on the first display,” and Claim 21 requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content of said user processing device to said transmitter on the at least one peripheral device through said port, and from the transmitter to the wireless communications network to the base node of the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device.”

Although the Petitioners lead Ground I with Ono, the Petitioners have failed to establish that Ono teaches the above features. *See* Petition at 31-33. Instead, Ono only generally describes “an image display apparatus and image display method that are capable of switching among a plurality of networked information terminal apparatuses and selecting a desired information terminal apparatus therefrom, and of displaying on a display section image information from the desired information terminal apparatus.” Ex. 1005 at [0007].

Petitioners allege that since Ono teaches that the “selection triggers a connection process between the selected information terminal apparatus and the

image display apparatus, which results in the transfer of the image information from the wireless connection module 44 to the wireless network and communications module 40 via the network” and “once the desired PC is connected, remote controller 69 may fast-forward/rewind images on the PC screen and, in conjunction therewith, the images projected on screen 5. A POSITA would have understood this fast-forwarding/rewinding to trigger additional transmissions of image information,” Ono discloses the claimed input device. *See* Petition at 32-33.

Petitioners, however, are improperly picking and choosing from the reference to support their flawed position, without fully appreciating the references for what they fairly suggest to one of ordinary skill in the art. *See In re Wesslau*, 353 F.2d 238, 241 (CCPA 1965) (“It is impermissible within the framework of section 103 to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.”). For example, as indicated above, Ono is clearly directed to an image display apparatus that is “capable of, from the side of the image display apparatus 1, switching among the plurality of networked

information terminal apparatuses and selecting the desired information terminal apparatus therefrom, and of displaying on the screen 5 of the image display apparatus 1 the image information from the desired information terminal apparatus.” Ex. 1005 at [0048] (emphasis added). That is, as admitted by the Petitioners, Ono teaches that the “selection triggers a connection process between the selected information terminal apparatus and the image display apparatus, which results in the transfer of the image information” (*see* Petition at 32), e.g., the control section 61 generates a connection request signal with respect to the information terminal apparatus selected by the selecting section 69 (*see* Ex. 1005 at [0045]). While Ono describes using a remote controller, e.g., from the side of the image display apparatus, Petitioners have not shown, nor does Ono teach, that a user action on the input device triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display. That is, Ono only states that a user action on the remote controller is used to select the desired information terminal apparatus to request connection, but not that the selection triggers the transfer of the user selected arbitrary media content from the transmitter to the wireless communications network and to the

base node.

In other words, Ono is clearly directed to USB modules that are inserted into information terminal apparatuses to connect the information terminal apparatuses to the wireless network. Thus, Petitioners are merely picking and choosing certain teachings of Ono, but provide no indication that Ono in fact teaches an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, as required by Claim 1, and as similarly recited in Claims 9 and 21, e.g., the user action on the input device triggers transfer of the user selected arbitrary media content from the transmitter, for example, so that the user processing device is not exposed to the network (*see* Ex. 1001 at 3:3-6 (“connecting to a network brings the danger of virus, malware or spyware transfer in either direction, and there is danger of copying of confidential information.”)).

Similarly, Corbett is merely directed to the “USB flash drive 100 may be connected to a host computer system 102 through a physical connection of the USB connector 106 of the flash drive 100 into the USB port 104 of the host

computer system 102.” Ex. 1007 at [0017]. Corbett also states that “Transfer of data from the nonvolatile memory to the external device 150 through the transmitter 122 may be initiated by any appropriate method or device. In one example, the user may provide a transmission initiation indication through the host computer system to initiate transmission of data to an external device. More particularly, a client driver (not shown) of the host computer system 102 may provide a dialog, menu, displayed button, or other appropriate user interface or selector which allows a user to initiate transfer of data. The host computer system may communicate the transmission initiation indication to the USB flash drive through the USB connection. In response to the transmission initiation indication, the transmitter may transmit data to the external device.” *Id.* at [0022]. Corbett further states that “transfer of data through the transmitter 122 may be initiated through selection of one or more selectors 130 of the USB flash drive. For example, as shown in FIG. 1, the USB flash drive 100 may include a transmission initiation selector 134, such as a button, selector wheel, and the like. Upon selection of the transmission initiation selector, the transmitter 122 may transmit all or a portion of the data stored in the computer readable medium 112 to the external device 150.” *Id.* at [0023]. That is, Corbett only describes a USB flash

drive for transmitting data from the USB flash device. There is no indication in Corbett of an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, as required by Claim 1, and as similarly recited in Claims 9 and 21.

That is, Petitioners have not established that any of the cited references of Ono and Corbett, taken alone or in combination, discloses or suggests each of the required elements of Claims 1, 9, and 21. For this reason alone, Petitioners failed to meet their burden of showing a reasonable likelihood that it would prevail with respect to any of the Challenged Claims, and institution should be denied.

Moreover, while Petitioners allege that “A POSITA would have found it obvious to incorporate an input device as claimed into Ono’s communication module 44 as disclosed by Corbett” (Petition at 33), Petitioners have not established “a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *See KSR* at 418. Instead, Petitioners are attempting to use a POSITA’s conclusory statements to supply a wholly missing claim limitation without

evidentiary support and the petition should be rejected. See *DSS Tech. Mgmt. Inc. v. Apple Inc.*, 885 F.3d 1367, 1377 (Fed. Cir. 2018) (The Board may not “rel[y] on ‘ordinary creativity’ ‘as a wholesale substitute for reasoned analysis and evidentiary support’ ‘when dealing with a limitation missing from the prior art references specified’”); *Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 851 F.3d 1270, 1274-1275 (Fed. Cir. 2017) (expert may not “fill in missing limitations” by alleging that a person of ordinary skill in the art would envision them).

Specifically, Petitioners have only established that Ono describes an image display apparatus that is capable of, from the side of the image display apparatus, switching among the plurality of networked information terminal apparatuses, whereas, Corbett is directed to a flashdrive with file synchronization capability. Petitioners then only provide conclusory statements, which are not supported with “reasoned analysis and evidentiary support,” to somehow allege that “there was a known desirability to provide a user of an electronic meeting tool with a local input device that would allow control over sharing the content of the user’s computer screen to a shared display.” Petition at 20; *see also* Ex. 1002 at [87]. For example, Petitioners assert that “Combining Ono’s user input device (remote

controller) with Ono's peripheral device (wireless communications module) could have been accomplished according to known methods (e.g., physically joining remote controller and communications module." *Id.*, *see also* Ex. 1002 at [86].

Petitioners further assert that "Grimshaw and Uchida both illustrate this desirability in the art and thus provide a specific design incentive to make the proposed modification to Ono's wireless communications module." *Id.*; *see also* Ex. 1002 at [87]-[100]. Such alleged modification, however, is entirely conclusory with respect to a reasoned rationale for modifying the teachings of Ono. Instead, as discussed above, Ono is specifically directed to an image display apparatus that is capable of, from the side of the image display apparatus, switching among the plurality of networked information terminal apparatuses, e.g., a central switching system, in which the insertion of the communications module connects the information terminal apparatuses to the network, while Corbett is directed to a flashdrive. As such, there is no reasoned analysis and evidentiary support from the teachings of Ono, Corbett, or any cited reference that would have prompted one having ordinary skill in the art to modify the information terminal apparatuses of Ono to have the remote control as an input device for the information terminal apparatuses and the user action on the input

device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node. Rather, such a modification would have improperly changed the principle operation of the image display system of Ono, since the inventors of Ono found that for operations performed on the side of the information terminal apparatus, it was difficult to select an information terminal apparatus from among a plurality of information terminal apparatuses on the side that sends the image (*see* Ex. 1005 at [0006]) and overcomes this deficiency “through operations using the remote controller 69 and with respect to the projector 60 of the image display apparatus 1, the image display system 10 is capable of switching among a plurality of information terminal apparatuses connected to a network and selecting the desired information terminal apparatus therefrom, and of displaying on a display section image information from the desired information terminal apparatus.” *Id.* at [0144].

That is, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices

according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does." *KSR* at 418 (emphasis added).

Without more than conclusory statements without reasoned analysis and evidentiary support, Petitioners have not shown that the cited art discloses or suggests the input device as claimed and institution should be denied.

2. Claim 16

Claim 16 requires “triggering transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless communications network and to the base node for displaying said user selected arbitrary media content on the first display, the input device being a physical actuator coupled to the peripheral device.”

Although the Petitioners allege that “Ono discloses triggering transfer (by selecting/connecting a particular PC) of said user selected arbitrary media content (image information) from said transmitter on the peripheral device (e.g., wireless communications module 44A) to the wireless communications network and to the

base node (e.g., communications module 40 and control section 61) for displaying said user selected arbitrary media content on the first display (image display apparatus 1), for reasons similar to those explained above for limitation 1(f)” (*see* Petition at 43), Petitioners failed to establish that the combination of Ono and Corbett, taken alone or in combination, discloses or suggests each and every feature recited in Claim 16. Instead, as discussed above, Ono is clearly directed to an image display apparatus that is “capable of, from the side of the image display apparatus 1, switching among the plurality of networked information terminal apparatuses and selecting the desired information terminal apparatus therefrom, and of displaying on the screen 5 of the image display apparatus 1 the image information from the desired information terminal apparatus.” Ex. 1005 at [0048] (emphasis added). While Petitioners allege that Corbett teaches that the “transmission initiation selector 134 physically resides on the peripheral device (USB flash drive)...A POSITA would have been motivated to include a transmission initiation selector for the reasons discussed above regarding limitation 1(f)” (*see* Petition at 43-44), as discussed above with respect to Claims 1, 9, and 21, Petitioners have not provided “reasoned analysis and evidentiary support” why the teachings of Ono would have been modified with the teachings

of Corbett. Instead, as discussed above, Ono is specifically directed to an image display apparatus that is capable of, from the side of the image display apparatus, switching among the plurality of networked information terminal apparatuses, e.g., a central switching system, in which the insertion of the communications module connects the information terminal apparatuses to the network, while Corbett is directed to a flashdrive. As such, there is no reasoned analysis and evidentiary support from the teachings of Ono, Corbett, or any cited reference that would have prompted one having ordinary skill in the art to modify the information terminal apparatuses of Ono to have the remote control as an input device for the information terminal apparatuses and the user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node, as such a modification would have improperly changed the principle operation of the image display system of Ono, e.g., as the inventors of Ono found that for operations performed on the side of the information terminal apparatus, it was difficult to select an information terminal apparatus from among a plurality of information terminal apparatuses on the side that sends the image (*see* Ex. 1005 at [0006]) and overcomes this deficiency “through operations using the remote

controller 69 and with respect to the projector 60 of the image display apparatus 1, the image display system 10 is capable of switching among a plurality of information terminal apparatuses connected to a network and selecting the desired information terminal apparatus therefrom, and of displaying on a display section image information from the desired information terminal apparatus.” *Id.* at [0144].

That is, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR* at 418 (emphasis added).

Without more than conclusory statements without reasoned analysis and evidentiary support, Petitioners have not shown that the cited art discloses or suggests the input device as claimed and institution should be denied.

C. Ground II is deficient with regard to Claims 1-10 and 14-21 because the alleged combination fails to disclose or suggest the input device, as required by Claims 1, 9, 16, and 21

For Ground II, Petitioners allege that a combination of the teachings of Uchida and Grimshaw teaches the input device and triggering transfer of said user selected arbitrary media content, as required by independent Claims 1, 9, 16, and 21. Petition at 46-49; 57-59; 66; 67. Petitioners, however, have failed to demonstrate how the teachings of Uchida and Grimshaw, taken alone or in combination, disclose or suggest the same combination of features as recited in Claims 1, 9, 16, and 21.

1. Claims 1, 9, and 21

Claim 1 requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device,” while Claim 9 similarly requires “an input device configured to allow the user to carry out a user action on the input device

that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and via the wireless communications network to the base node for display on the first display,” and Claim 21 requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content of said user processing device to said transmitter on the at least one peripheral device through said port, and from the transmitter to the wireless communications network to the base node of the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device.”

Although the Petitioners lead Ground II with Uchida, the Petitioners have failed to establish that Uchida teaches the above features. *See* Petition at 57-58. Instead, Uchida only generally describes “an image projection system including an image projection device having a wireless unit that receives image data transmitted by wireless communication from an external computer device and projects an image corresponding to the image data, and a remote control device that remotely controls the operation of the image projection device, and a device that can be communicatively connected to both the computer device and the

remote control device, wherein the remote control device has a wireless setting information generating means for generating the wireless setting information required for wireless communication between the image projection device and the computer device.” Ex. 1009 at [0013]. Specifically, Uchida describes “a wireless setting information generating means for generating the wireless setting information required for wireless communication between the image projection device and the computer, a wireless setting information writing means for writing the wireless setting information to the device at a predetermined timing, and a notification means for notifying the image projection device of the wireless setting information written to the device. Therefore, communication between the image projection device and the computer device can be performed based on the wireless communication setting information set by the remote control device, making it possible to provide a highly confidential wireless device or image projection system.” *Id.* at [0026].

Petitioners allege that since Uchida teaches an image transfer stop switch 140, Uchida teaches the claimed input device. *See* Petition at 57-58. Petitioners, however, are improperly picking and choosing from the references to support their flawed position, without fully appreciating the references for what they

fairly suggest to one of ordinary skill in the art. *See In re Wesslau* at 241. For example, as indicated above and admitted by the Petitioners (*see* Petition at 58), Uchida states that the “image transfer stop switch 140 is a slide switch that serves as an image transmission stop operation unit for instructing the image projection device 3 to stop transmitting the image data, and is a changeover switch that switches between an image stop ON mode and an image stop OFF mode.” Ex. 1009 at [0071]. Uchida further states that “the image transfer stop switch 140 is operated to the image stop ON mode side while connected to the computer device 4 via the USB connector 105, the CPU 101 notifies the computer device 4 of this information.” *Id.* As such, Uchida only describes that the image transfer stop switch is used “for instructing the image projection device 3 to stop transmitting the image data” and for notifying the computer device 4 of the ON mode. That is, Uchida describes a USB device with a wireless transmitter to send image data from a computer to a projector, in which the USB device has an on/off button. There is nothing in Uchida, nor has Petitioners established, that the image transfer stop switch of Uchida allows the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through

the wireless communications network for display on the first display, as recited in Claim 1 and similarly recited in Claims 9 and 21. Thus, Petitioners are merely picking and choosing certain teachings of Uchida, but has not established that Uchida, in fact, teaches the features as required by Claim 1, and as similarly recited in Claims 9 and 21.

Moreover, Petitioners allege that Grimshaw teaches “where each button triggers transfer of said user selected arbitrary media content.” Petition at 58-59. Petitioners, however, have failed to establish that Grimshaw makes up for the deficiencies of Uchida. Rather, Grimshaw describes that “a user may engage or push a button 344, 354, 364, 374 on their user module in order to take control of display module 22 (e.g., display module 22 could show whatever is currently being displayed on the screen of the laptop computer connected to the selected user module). In the example above, controller 324 reviews the status of buttons 344, 354, 364, 374, determines that user module 14 has been selected, and sends command signals to switch controller 318, video processor 316 and/or converter 320 instructing them to pass the data signals from the selected user module 14 to display module 22. It is possible for controller 324 to review the status of each user module 14-20 or only those user modules that have a laptop computer or

other device connected thereto, to cite a few possibilities.” Ex. 1008 at [0020].

Grimshaw further states that “if a user presses or otherwise engages button 344 on user module 14, then communications system 10 (more specifically, controller 324 and switch controller 318) gives control of display module 22 to user module 14.” *Id.* at [0027]. As such, Grimshaw only generally describes that the buttons on the user module are used to take control of the display module, in which a controller and switch controller are used to pass the data signals from the selected user module to the display module. That is, Grimshaw describes a different type of button that is integrated into a piece of furniture, but there is no indication in Grimshaw of an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, as required by Claim 1, and as similarly recited in Claims 9 and 21.

That is, Petitioners have not established that any of the cited references of Uchida and Grimshaw, taken alone or in combination, discloses or suggests each of the required elements of Claims 1, 9, and 21. For this reason alone, Petitioners failed to meet their burden of showing a reasonable likelihood that it would

prevail with respect to any of the Challenged Claims, and institution should be denied.

Moreover, while Petitioners allege that “A POSITA would have found it obvious to implement a wireless device (like that of Uchida) with a physical actuator (input device) that triggers transfer of media content from a wireless device to an image projection device through the wireless communications network, as recited claims 1, 9, 16, and 21” (Petition at 48-49), Petitioners have not established “a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *See KSR* at 418. Instead, Petitioners are attempting to use a POSITA’s conclusory statements to supply a wholly missing claim limitation without evidentiary support and the petition should be rejected. *See DSS Tech. Mgmt. Inc.* at 1377; *Nidec Motor Corp.* at 1274-1275.

Specifically, Petitioners have only established that Uchida requires the use of a remote control device 2 for connecting the computer device 4 to the image projection device 3. For example, Uchida describes that “when the image projection device 3 receives the wireless setting information by an infrared signal from the remote control device 2, it puts its own wireless unit into an operating

state, and then determines whether or not wireless communication with the computer device 4 is in progress 50 via the wireless unit, and when the state in which it is determined that wireless communication with the computer device 4 is not in progress continues for a certain period of time, it puts its own wireless unit into a non-operating state. It should be noted that the image projection device 3 being in wireless communication with the computer device 4 does not only include a state in which image data is being transmitted from the computer device 4 to the image projection device 3, but also includes a state in which a wireless link is established between the computer device 4 and the image projection device 3.” Ex. 1009 at [0055]. Uchida further states that “it is not preferable from the viewpoint of security if the wireless setting information that the remote control device 2 writes to the wireless device 1 is always constant. In addition, there is a risk that unintended image data may be transmitted from the computer device 4 to the image projection device 3 if the wireless device 1 is forgotten to be removed. Therefore, the remote control device 2 updates at least the encryption key in the wireless setting information.” *Id.* at [0056]. As such, Petitioners have only provided conclusory statements by merely stating that “a POSITA would have found it obvious to implement a wireless device (like that of Uchida) with a

physical actuator (input device) that triggers transfer of media content from a wireless device to an image projection device” (*see* Petition at 48; *see also* Ex. 1002 at [167]), which are not supported with “reasoned analysis and evidentiary support.”

For example, as discussed above, Uchida is specifically directed to using a remote control device 2 to not only generate wireless setting information required for wireless communication between the image projection device 3 and the computer device 4, e.g., exposing the computer device 4 to the network, but also to prevent image data from being erroneously sent from a computer device and remotely control the operation of the image projection device 3. As such, if the wireless device 1 of Uchida was modified as suggested by the Petitioners to include the button of Grimshaw, such modification would have improperly changed the principle of operation of Uchida, since the system would not be able to prevent image data from being erroneously sent to the image projection device nor generate wireless setting information. Rather, the wireless device of Uchida modified with the button of Grimshaw would provide a user with the ability to take over the communication system via wired connection. Thus, there is no reasoned analysis and evidentiary support from the teachings of Uchida or any of

the cited references that would have prompted one having ordinary skill in the art to modify the wireless device of Uchida as suggested by Petitioners.

That is, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR* at 418 (emphasis added).

Without more than conclusory statements without reasoned analysis and evidentiary support, Petitioners have not shown that the cited art discloses or suggests the input device as claimed and institution should be denied.

2. Claim 16

Claim 16 requires “triggering transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless communications network and to the base node for displaying said user selected arbitrary media content on the first display, the input device being a physical

actuator coupled to the peripheral device.”

Although the Petitioners allege that “Uchida alone or in combination of Grimshaw discloses and/or suggests this limitation” (*see* Petition at 66), Petitioners failed to establish that the combination of Uchida and Grimshaw, taken alone or in combination, discloses or suggests each and every feature recited in Claim 16. Instead, as discussed above, Uchida is clearly directed an image projection system that includes a remote control and a USB device with a wireless transmitter to send image data from a computer to a projector, in which the USB device has an on/off button. There is nothing in Uchida, however, that the switching of the image transfer stop switch from on/off, in fact, triggers transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless communications network and to the base node for displaying said user selected arbitrary media content on the first display and that the input device being a physical actuator coupled to the peripheral device, as required by Claim 16.

Similarly, while Petitioners allege that Grimshaw discloses that “pressing a button 344 on user module 14 to trigger transfer of data signals to a control module 12 for displaying content of laptop screen on a display 2” (*see* Petition at

66), as discussed above, Grimshaw describes a different signal transfer process than recited in Claim 16. Rather, Grimshaw states that “a user may engage or push a button 344, 354, 364, 374 on their user module in order to take control of display module 22 (e.g., display module 22 could show whatever is currently being displayed on the screen of the laptop computer connected to the selected user module). In the example above, controller 324 reviews the status of buttons 344, 354, 364, 374, determines that user module 14 has been selected, and sends command signals to switch controller 318, video processor 316 and/or converter 320 instructing them to pass the data signals from the selected user module 14 to display module 22. It is possible for controller 324 to review the status of each user module 14-20 or only those user modules that have a laptop computer or other device connected thereto, to cite a few possibilities.” Ex. 1008 at [0020]. There is no indication in Grimshaw, however, of triggering transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless communications network and to the base node for displaying said user selected arbitrary media content on the first display, the input device being a physical actuator coupled to the peripheral device, as required by Claim 16.

That is, Petitioners have not established that any of the cited references of

Uchida and Grimshaw, taken alone or in combination, discloses or suggests each of the required elements of Claim 16. For this reason alone, Petitioners failed to meet their burden of showing a reasonable likelihood that it would prevail with respect to any of the Challenged Claims, and institution should be denied.

Moreover, even assuming *arguendo* that Grimshaw teaches the triggering as recited in Claim 16, as discussed above, Petitioners have not provided “reasoned analysis and evidentiary support” why the teachings of Uchida would have been modified with the teachings of Grimshaw. Rather, Uchida is specifically directed to using a remote control device 2 to not only generate wireless setting information required for wireless communication between the image projection device 3 and the computer device 4, e.g., exposing the computer device 4 to the network, but also to prevent image data from being erroneously sent from a computer device and remotely control the operation of the image projection device 3. As such, if the wireless device 1 of Uchida was modified as suggested by the Petitioners to include the button of Grimshaw, such modification would have improperly changed the principle of operation of Uchida, since the system would not be able to prevent image data from being erroneously sent to the image projection device or generate wireless setting information. Rather, the

wireless device of Uchida modified with the button of Grimshaw would provide a user with the ability to take over the communication system using a wired connection. Thus, there is no reasoned analysis and evidentiary support from the teachings of Uchida or any of the cited references that would have prompted one having ordinary skill in the art to modify the wireless device of Uchida as suggested by Petitioners.

That is, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR* at 418 (emphasis added).

Without more than conclusory statements without reasoned analysis and evidentiary support, Petitioners have not shown that the cited art discloses or suggests the input device as claimed and institution should be denied.

3. Ground III is deficient with regard to Claims 1-2, 6-10, 13, 15-17, and 19-21 because the alleged combination fails to disclose or suggest the input device, as required by Claims 1, 9, 16, and 21

For Ground III, Petitioners allege in Ground III of the petition that a combination of the teachings of Ichieda teaches the input device and triggering transfer of said user selected arbitrary media content, as required by independent Claims 1, 9, 16, and 21. Petition at 67-71; 77; 82-83. Petitioners, however, have failed to demonstrate how the teachings of Ichieda disclose or suggest the same combination of features as recited in Claims 1, 9, 16, and 21.

1. Claims 1, 9, and 21

Claim 1 requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device,” while Claim 9 similarly requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and via the wireless

communications network to the base node for display on the first display,” and Claim 21 requires “an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content of said user processing device to said transmitter on the at least one peripheral device through said port, and from the transmitter to the wireless communications network to the base node of the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device.”

Although the Petitioners allege in Ground III that Ichieda teaches the features of Claims 1, 9, and 21, the Petitioners have failed to establish that Ichieda teaches the above features. *See* Petition at 67-71; 77. Instead, Ichieda only describes “an image display device, an image display system, and a network connection method allowing the user to easily perform the procedures for establishing the network connection to the image display device such as a projector.” Ex. 1006 at [0008]. Ichieda further states that “As shown in FIG. 11, the image display system 1 of the present embodiment provided with a projector 50... and a laptop type of personal computer 90 (hereinafter referred to as a laptop PC) provided with an information terminal 80 connected thereto as an

image supply device.” *Id.* at [0129]. That is, Ichieda is directed to providing connectivity details for a wireless projector, e.g., via QR code, in which terminals, such as, mobile-phone like devices can scan the QR code and setup connection, while the communication section is in the personal computer.

Petitioners allege that since Ichieda teaches the operation section 83 and that the operation section 83 is equipped with a plurality of operations buttons for performing various instructions to the information terminal 80, Ichieda discloses the claimed input device. *See* Petition at 77. Petitioners, however, are improperly picking and choosing from the reference to support their flawed position, without fully appreciating the references for what they fairly suggest to one of ordinary skill in the art. *See In re Wesslau* at 241. For example, Ichieda describes in FIG. 11 “the image display system 1 of the present embodiment provided with a projector 50 having the same configuration as in the first embodiment as the image display device, and a laptop type of personal computer 90 (hereinafter referred to as a laptop PC) provided with an information terminal 80 connected thereto as an image supply device.” Ex. 1006 at [0129]. Ichieda further states that “the information terminal 80 has the same configuration as in the first embodiment except that the information terminal 80 has an interface (I/F) section

88 capable of wired data communication with an external device instead of the communication section 86.” *Id.* at [0131]. Furthermore, Ichieda states that “The communication section 96 is a wireless LAN module compliant to the wireless LAN standard such as IEEE 802.11b, IEEE 802.11g, or IEEE 802.11a, and is capable of performing transmission and reception of command relating to the wireless LAN connection, transmission of the image signal, and so on in response to the instructions of the control section 91.” *Id.* at [0136]. That is, Ichieda only describes that the information terminal 80 is used to recognize the connection information, and once the laptop PC 90 is connected, the internal components of the laptop PC 90 are used for transmission of the image signal.

Thus, Petitioners are merely picking and choosing certain teachings of Ichieda, but provide no indication that Ichieda in fact teaches an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, as required by Claim 1, and as similarly recited in Claims 9 and 21.

That is, Petitioners have not established that Ichieda discloses or suggests

each of the required elements of Claims 1, 9, and 21. For this reason alone, Petitioners failed to meet their burden of showing a reasonable likelihood that it would prevail with respect to any of the Challenged Claims, and institution should be denied.

Moreover, while Petitioners allege that “Given Ichieda’s disclosure of how cellphone 80 can transmit the image signal to projector 50, a POSITA would have understood it would also be used in the variation of the third embodiment, namely utilizing communication section 86 of an information terminal 80 to transmit the image signal (as described with respect to the first embodiment) obtained from USB port 97 of the laptop PC 90 (as described in the third embodiment)” (*see* Petition at 70; *see also* Ex. 1002 at 211-215), Petitioners have not established “a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *See KSR* at 418. Instead, Petitioners are attempting to use a POSITA’s conclusory statements to supply a wholly missing claim limitation without evidentiary support and the petition should be rejected. *See DSS Tech. Mgmt. Inc.* at 1377; *Nidec Motor Corp.* at 1274-1275.

Specifically, Petitioners have only established that Ichieda describes in the

third embodiment that “the image display system 1 of the present embodiment provided with a projector 50... and a laptop type of personal computer 90 (hereinafter referred to as a laptop PC) provided with an information terminal 80 connected thereto as an image supply device.” *Id.* at [0129]. As discussed above, Ichieda further states that “the information terminal 80 has the same configuration as in the first embodiment except that the information terminal 80 has an interface (I/F) section 88 capable of wired data communication with an external device instead of the communication section 86.” *Id.* at [0131] (emphasis added). As such, Ichieda explicitly excludes the information terminal 80 as having the communication section 86, but rather uses an interface (I/F) section 88 for wired data communication with the external device, in which the internal components of the external device are used to transmit the image signal. That is, contrary to the Petitioners’ assertion that since Ichieda teaches in the first embodiment that the cellphone 80 can transmit the image signal to projector 50, that a POSITA would have used such teaching in the variation of the third embodiment, the Petitioners statements are entirely conclusory and are not supported with “reasoned analysis and evidentiary support,” since Ichieda contemplates the first embodiment and modifies the information terminal anyways to have different components and

functions. Thus, there is no reasoned analysis and evidentiary support from the teachings of Ichieda or any of the cited references that would have prompted one having ordinary skill in the art to modify the image display system of Ichieda as suggested by Petitioners.

That is, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR* at 418 (emphasis added).

Without more than conclusory statements without reasoned analysis and evidentiary support, Petitioners have not shown that the cited art discloses or suggests the input device as claimed and institution should be denied.

2. Claim 16

Claim 16 requires “triggering transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless

communications network and to the base node for displaying said user selected arbitrary media content on the first display, the input device being a physical actuator coupled to the peripheral device.”

Although the Petitioners allege that “Ichieda discloses and/or suggests triggering transfer of said user selected arbitrary media content (image signal) from said transmitter (communication section 83) on the peripheral device (information terminal 80) to the wireless communications network (wireless LAN) and to the base node (communications section 63 and control section 55) for displaying said user selected arbitrary media content on the first display, the input device being a physical actuator (connection button) coupled to the peripheral device for reasons discussed regarding limitation 1(f)” (*see* Petition at 82), Petitioners failed to establish that the Ichieda discloses or suggests each and every feature recited in Claim 16, for at least the same reasons with respect to Claims 1, 9, and 21, discussed above. Instead, as discussed above, Ichieda only describes that “As shown in FIG. 11, the image display system 1 of the present embodiment provided with a projector 50... and a laptop type of personal computer 90 (hereinafter referred to as a laptop PC) provided with an information terminal 80 connected thereto as an image supply device.” *Id.* at [0129]. That is,

Ichieda is directed to providing connectivity details for a wireless projector, e.g., via QR code, in which terminals, such as, mobile-phone like devices can scan the QR code and setup connection, while the communication section is in the personal computer. Thus, there is no teaching in Ichieda, nor has Petitioners established that Ichieda, in fact, discloses or suggests “triggering transfer of said user selected arbitrary media content from said transmitter on the peripheral device to the wireless communications network and to the base node for displaying said user selected arbitrary media content on the first display, the input device being a physical actuator coupled to the peripheral device,” as required by Claim 16.

That is, “a patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *KSR* at 418 (emphasis added).

Without more than conclusory statements without reasoned analysis and evidentiary support, Petitioners have not shown that the cited art discloses or suggests the input device as claimed and institution should be denied.

VI. THE BOARD SHOULD EXERCISE ITS DISCRETION TO DENY INSTITUTION

The Board should exercise its discretion to deny institution of the inter partes review of the Challenged Claims of the ‘951 patent under 35 U.S.C. § 325(d). The subject matter of the prior art relied on by Petitioners was previously considered and distinguished during prosecution of the parent to the ‘951 patent and the arguments presented by Petitioners add nothing new from what was already known and considered by the Examiner during prosecution.

The Board considers several factors when evaluating whether to exercise its discretion under Section 325(d), including (a) the similarities and material differences between the asserted art and the prior art involved during examination; (b) the cumulative nature of the asserted art and the prior art evaluated during examination; (c) the extent to which the asserted art was evaluated during examination, including whether the prior art was the basis for rejection; (d) the extent of the overlap between the arguments made during examination and the

manner in which Petitioner relies on the prior art or Patent Owner distinguishes the prior art; (e) whether Petitioner has pointed out sufficiently how the Examiner erred in its evaluation of the asserted prior art; and (f) the extent to which additional evidence and facts presented in the Petition warrant reconsideration of the prior art or arguments. *Becton, Dickinson and Co. v. B. Braun Melsungen AG*, IPR2017-01586, slip op. at 17–18 (Paper 8) (PTAB Dec. 15, 2017) (informative). In this case, most of the *Becton Dickinson* factors weigh in favor of denying institution.

First, the Examiner during the reexamination of U.S. patent 8,756,348, which is the parent to the ‘951 patent, considered WIPO Publication 2010/105335 which claims priority to U.S. publication 2009/0198839 (Ex. 1021) (referred to herein as “Banerjee”) and U.S. 2010/032454 to Epstein. *See* Ex. 2001 at 273-291. Petitioners assert that “Ono, Ichieda, Corbett, and Grimshaw were not considered during prosecution of Application No. 16/990,215 (which led to the ‘951 patent).” Petition at 5. However, there are no differences between the prior art asserted in this Petition and the prior art already considered by the examiner during prosecution of the application which led to the ‘951 patent. Specifically, Ono, Ichieda, Corbett, and Grimshaw are similar to the teachings of Banerjee and Epstein, which where

already considered by the Examiner.

For example, as admitted by the Petitioners with respect to the U.S. publication that corresponds to WIPO publication 2010/105335, “Banerjee describes a plug-and-play device 236 that ‘captures...screen display data generated at the remote computer 240 and allows screen sharing between the remote computer 240 and the master computer 238.’” Petition at 7 (citing Ex. 1021 at [0039]). As further admitted by Petitioners, “Banerjee contemplates that communication can be made to multiple remote computers via respective plug-and-play devices.” Ex. 1002 at [57]. As such, as seen in FIG. 4 of Banerjee (reproduced below), Banerjee describes “system 220 comprises a plug-and-play device 236, a master computer 238 and at least one remote computer 240. The plug-and-play device 236 is physically connected to the remote computer 240 and communicates with the master computer 238 over a wireless communications link. In this embodiment, plug-and-play device 236 captures and compresses screen display data generated at the remote computer 240 and allows screen sharing between the remote computer 240 and the master computer 238 by automatically launching software stored on the plug-and-play device 236.” Ex. 2002 at [0039]. Banerjee further states that “plug-and-play devices are well known and many types

of plug- and-play standards exist, including for example universal serial bus ("USB"), IEEE1394 ("FireWire") and PCMCIA ("PC Card"), with the most common being USB." *Id.* at [0003].

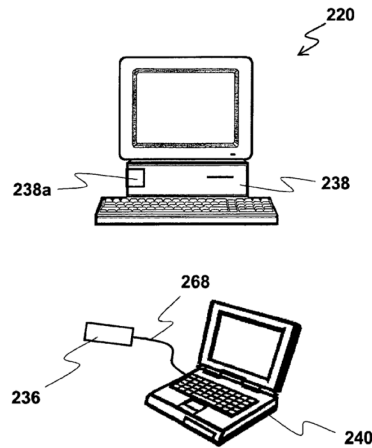


FIG. 4

As such, Banerjee describes at least a “plug-and-play device 236 that captures and compresses screen display data generated at the remote computer 240 and allows screen sharing between the remote computer 240 and the master computer 238.” *See* Ex. 1002 at [56].

Similarly, as admitted by the Petitioners, “Ono describes an image display system including an image display apparatus (*e.g.*, projector and screen) that

receives images transferred from multiple information terminal apparatus (*e.g.*, personal computers PCs)) connected via a wireless network and displays them.”

Petition at 12-13.

Furthermore, as further admitted by the Petitioners, “Ichieda describes an image display system 1 including a projector 50 which connects to information terminals 8080a-80d (*e.g.*, mobile phones) over a wireless LAN” in which “the phone is connected to the laptop PC 90 and the images displayed on the laptop display section 94 are sent to the projector” (*Id.* at 13-15), which is also similar to the teachings of Banerjee.

Still further, Corbett also describes a similar system as Banerjee, in which Corbett describes “a peripheral device, such as a USB flash drive 100, that connects to a host computing system 102 and includes a transmitter 122 for wireless transmission of data to an external device 150.” *Id.* at 15-16.

Moreover, Uchida describes a similar system as Banerjee of “an image projection system including an image projection device having a wireless unit that receives image data transmitted by wireless communication from an external computer device and projects an image corresponding to the image data, and a

remote control device that remotely controls the operation of the image projection device, and a device that can be communicatively connected to both the computer device and the remote control device, wherein the remote control device has a wireless setting information generating means for generating the wireless setting information required for wireless communication between the image projection device and the computer device.” Ex. 1009 at [0013].

Therefore, none of Ono, Ichieda, Corbett, and Uchida provide nothing new that Banerjee did not already disclose, since the art cited by Petitioners are all directed to similar systems that communicates data over a wireless communications link.

Moreover, Epstein describes a collaborate workspace configuration in which “each control interface is configured to include a separate selectable buttons for each common display where, when a button is selected so that a source associated with the interface is to drive an associated display, the appearance of the button or an indicator associated therewith is modified to indicate to the user which of the common displays is currently being driven.” Ex. 2003 at [0010]. As seen in FIG. 8 of Epstein (reproduced below), “a puck 57 is shown moving out of the cavity under the door 51 and onto the work surface where the cable 59 associated

with the puck is linked to the laptop 53.” *Id.* at [0064].

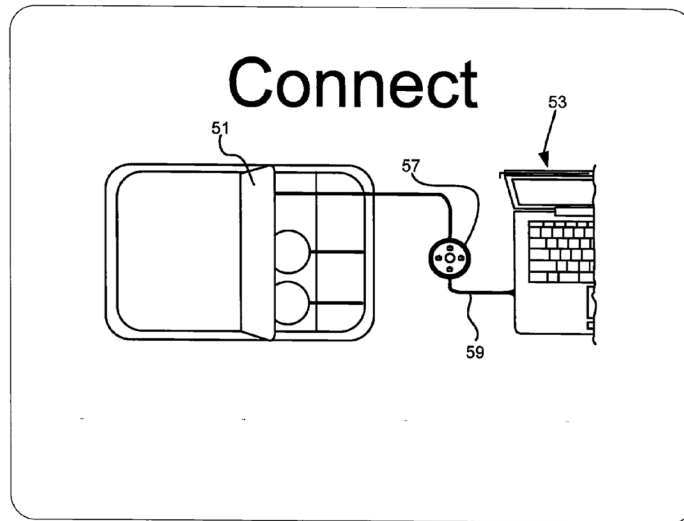


Fig. 8

Epstein further describes, as seen in FIG. 19 of Epstein (produced below), that “in wireless embodiments, a mechanical control interface 140 akin to puck 48 described above may be provided where the interface 140 links to a USB port or the like on a laptop 69. Here, interface 140 operates in the same fashion as puck 48 described above except that control signals from interface 140 are provided to a switching device wirelessly through the laptop.” *Id.* at [0075].

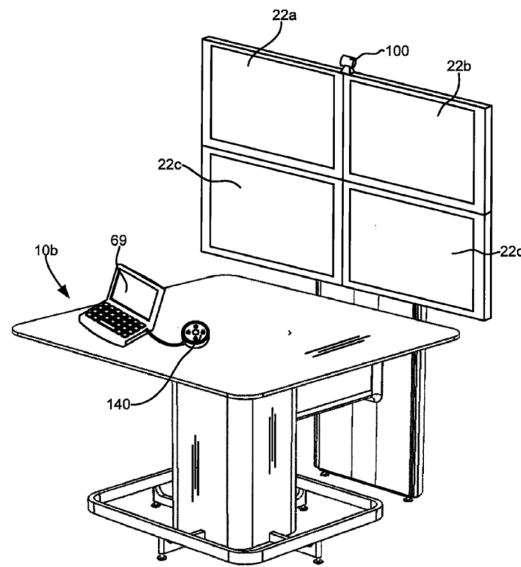


Fig. 19

As such, Epstein describes a puck that is linkable to the laptop to present information to anyone or combination of displays.

Similarly, Grimshaw describes that the “user modules include a button which let a user take control over the content of display module 22 and switch the displayed content to the content on their respective laptop.” *See* Petition at 16-17.

Therefore, Grimshaw provides nothing new that Epstein did not already disclose, since the art cited by Petitioners are all directed to a similar system that uses a button for displaying content on the displays.

Second, as discussed above, all of Ono, Ichieda, Corbett, and Uchida are just cumulative of Banerjee, while Grimshaw is merely cumulative of Epstein, as specifically discussed above, and Banerjee and Epstein were fully evaluated and distinguished during the reexamination of U.S. patent 8,756,348, which is the parent to the '951 patent. Thus, Ono, Ichieda, Corbett, Uchida, and Grimshaw are merely cumulative of the art already considered by the Examiner during prosecution of the '951 patent.

Third, Banerjee and Epstein were fully evaluated and distinguished during the reexamination of U.S. patent 8,756,348, which is the parent to the '951 patent, and Ono, Ichieda, Corbett, Uchida, and Grimshaw disclose nothing more than what was already disclosed and considered in Banerjee and Epstein. Although Ono, Ichieda, Corbett, Uchida, and Grimshaw were not the basis of a rejection during prosecution, the subject matter being relied upon by Petitioners was fully disclosed in Banerjee and Epstein and evaluated during prosecution of the '951 patent.

Fourth, Petitioners provide no additional evidence and facts in this Petition that warrants reconsideration of the prior art or arguments. Petitioners asserts that Ono, Ichieda, Corbett, and Grimshaw were not considered during prosecution of Application No. 16/990,215” and “Although Uchida was cited during prosecution,

this foreign language document was among more than 20 cited references and not otherwise mentioned.” Petition at 5.

However, as indicated above, the similar disclosures of Banerjee and Epstein were evaluated and distinguished during the reexamination of U.S. patent 8,756,348, which is the parent to the ‘951 patent, and considered during prosecution of the ‘951 patent. The Petitioners provide nothing new from what was already known and considered.

Therefore, since most of the *Becton Dickinson* factors weigh in favor of denying institution, the Board should exercise its discretion and deny institution as to all the Challenged Claims.

VII. CONCLUSION

Based on the deficiencies identified above, Petitioners have not shown a reasonable likelihood of prevailing on any of their proposed grounds. Thus, Patent Owner respectfully submits that the Board should decline to institute an IPR proceeding.

Respectfully submitted,

Date: January 9, 2025

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CERTIFICATION UNDER 37 CFR §42.24(d)

Under the provisions of 37 CFR §42.24(d), the undersigned hereby certifies that the word count for the foregoing Patent Owner's Preliminary Response totals 13,820, which is less than the 14,000 allowed under 37 CFR §42.24(b)(1).

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on January 9, 2025, a complete and entire copy of this Patent Owner's Preliminary Response and Accompanying Exhibits were provided via electronic service, to the Petitioners by serving the correspondence address of record as follows:

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