

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

BARCO N.V.
Patent Owner

U.S. Patent No. 11,422,951
IPR2024-01439

**Declaration of Dr. Kevin C. Almeroth in Support of Petitioner's Reply in the
Inter Partes Review of U.S. Patent No. 11,422,951**

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TABLE OF EXHIBITS

EXHIBIT	DESCRIPTION
EX-1001	U.S. Patent No. 11,422,951
EX-1002	Declaration of Kevin C. Almeroth, Ph.D.
EX-1003	Curriculum Vitae of Kevin C. Almeroth, Ph.D.
EX-1004	File History of U.S. Patent No. 11,422,951
EX-1005	U.S. Patent Application Publication No. 2005/0210390 (“Ono”)
EX-1006	U.S. Patent Application Publication No. 2008/0074560 (“Ichieda”)
EX-1007	U.S. Patent Application Publication No. 2006/0069840 (“Corbett”)
EX-1008	U.S. Patent Application Publication No. 2011/0096138 (“Grimshaw”)
EX-1009	English Translation of Japanese Patent Application Publication No. 2008-165007 (“Uchida”)
EX-1010	Japanese Patent Application Publication No. 2008-165007
EX-1011	Certification for English Translation of Japanese Patent Application Publication No. 2008-165007
EX-1012	U.S. Provisional Application No. 61/255,326 (“Grimshaw Provisional”)
EX-1013- EX-1019	RESERVED
EX-1020	U.S. Patent Application Publication No. 2010/0087139 (“Glass”)
EX-1021	U.S. Patent Application Publication No. 2009/0198839 (“Banerjee”)
EX-1022	U.S. Patent Application Publication No. 2011/0115689 (“Sugiyama”)
EX-1023	U.S. Patent Application Publication No. 2009/0187687 (Hulbert”)
EX-1024	U.S. Patent Application Publication No. 2003/0112975 (“Taiwanese”)

EXHIBIT	DESCRIPTION
EX-1025	U.S. Patent Application Publication No. 2010/0017744 (Kikuchi")
EX-1026	U.S. Patent Application Publication No. 2009/0172219 ("Mardiks")
EX-1027	U.S. Patent Application Publication No. 2010/0295994 ("Kaplan")
EX-1028	U.S. Patent Application Publication No. 2003/0098819 ("Sukthankar")
EX-1029	U.S. Patent Application Publication No. 2002/0159419 ("Morris")
EX-1030	EP Patent Application Publication No. 2107463 ("Deforche")
EX-1031	English Translation of Japanese Patent Application Publication No. 2007-208606 ("Maeda")
EX-1032	RESERVED
EX-1033	U.S. Patent Application Publication No. 2002/0196378 ("Slobodin")
EX-1034	U.S. Patent Application Publication No. 2002/0174254 ("Kita")
EX-1035- EX-1049	RESERVED
EX-1050	Imation Wireless Projection Link User Guide
EX-1051	EZAir Press Release, "EZAir Wireless PC to TV Solutions Now Available Across Europe," March 16, 2011
EX-1052	Warpia Product Brief, "Wireless USB PC to TV Audio/Video Display Adapter," 2009
EX-1053	Q-Waves Product Overview, "Quicklink TV," November 2010
EX-1054	IOGear Installation Guide, "Wireless USB to VGA Kit," 2008
EX-1055	JP Patent Application Publication No. 2007-208606
EX-1056	Certification for English Translation of JP Patent Application Publication No. 2007-208606
EX-1057- EX-1065	RESERVED

EXHIBIT	DESCRIPTION
Ex-1066	Portion of ctrl. no. 90/014,087 file history
Ex-1067	CSE-800 User Guide
Ex-1068	'237 Brogioli report
Ex-1069	Clickshare CSE-200 base unit firmware
Ex-1070	'002 Brogioli Deposition Transcript
Ex-1071	'237 Brogioli Deposition Transcript
Ex-1072	'676 Brogioli Deposition transcript
Ex-1073	'951 Brogioli Deposition transcript
Ex-1074	What is a driver?
Ex-1075	ClickShare Button connection issues
Ex-1076	ClickShare C-5 Base Unit Datasheet
Ex-1077	https://www.barco.com/en/inspiration/news-insights/2019-05-03-different-ways-to-share-your-content-with-clickshare (retrieved September 24, 2025).
Ex-1078	Erwin Six depo. transcript
Ex-1079	Barco Driver Version Installed 18-7-2025 (https://www.barco.com/en/support/knowledge-base/12770-clickshare-windows-driver-version-installed)
Ex-1080	"Why is ClickShare Windows Driver required and how can I install/update it on my PC?" (https://www.barco.com/en/support/knowledge-base/5676-clickshare-windows-driver-requirements-and-installation)
Ex-1081	Minidrivers, Miniport drivers, and driver pairs (https://learn.microsoft.com/en-us/windows-hardware/drivers/gettingstarted/minidrivers-and-driver-pairs)
Ex-1082	Yealink Press Release (https://www.yealink.com/en/product-detail/wireless-presentation-wpp30-eol)
Ex-1083	Second Declaration of Declaration of Kevin C. Almeroth, Ph.D.

EXHIBIT	DESCRIPTION
Ex-1084	Dr. Brogioli Dist. Ct. Transcript
Ex-1085	USB Audio Class System Driver (Usbaudio.sys) (https://learn.microsoft.com/en-us/windows-hardware/drivers/audio/usb-audio-class-system-driver--usbaudio-sys-)
Ex-1086	U.S. Patent No. 10,762,002
Ex-1087	U.S. Patent No. 11,403,237
Ex-1088	U.S. Patent No. 11,258,676
Ex-1089	RESERVED
Ex-1090	Deposition transcript of Andrew Ludke, Crestron
Ex-1091	Deposition transcript of William Scally, Barco's damages expert

I. INTRODUCTION

1. I have reviewed the Patent Owner's Response ("POR," Paper 19) and the associated exhibits. Below are my opinions concerning the POR.

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

2. In my opinion, the Patent Owner selectively references my testimony in an attempt to suggest inconsistency where there is none. For example, the Patent Owner highlights my statement that "data is data." POR, 10-11, citing Ex-2006, transcript from IPR2024-01436. It is universally accepted in the field of Computer Science that all data in general-purpose computers is ultimately represented as binary values, i.e., 1's and 0's. This data, regardless of its type, is transmitted and received over various interfaces, such as USB. My testimony was limited to this foundational concept and, in my view, does not reflect any deficiency in my expertise.

3. In a separate proceeding that addressed an unrelated issue, I testified regarding prior art that teaches transcoding data "based on a type of functional data." *See* Ex. 2030, ¶¶212-213. In my opinion, this simply illustrates the routine nature of encoding and decoding audio and video data with different codecs, which is a common practice in the field. That testimony is not relevant to my "data is data" comment in the related '1436 IPR, except to reaffirm that all digital data consists of 1's and 0's and, at the physical layer, can be transferred across any general-purpose

computer interface, such as USB. Such physical layer transfers do not obviate the ability to use specialized delivery functions (*e.g.*, reliability, quality-of-service) at higher layers in the protocol stack (*e.g.*, network, transport, and application layers).

4. The Patent Owner also asserts that I lack clarity regarding the definition of “driver,” noting that I provided a specific definition for this proceeding. In my experience, there is no inconsistency in this position, as the term “driver” can have different meanings depending on the context in which it is used. *See, e.g.*, Ex-1074 (“What is a driver?”). It is common in the field for technical terms to have context-dependent definitions.

5. Furthermore, the Patent Owner devotes several pages to disputing my opinion that implementation details often represent design choices, claiming that my views are unreliable or inconsistent. POR, 12-16. In my opinion, the Patent Owner’s argument attempts to confine the prior art solely to its explicit disclosures, without considering how a POSA would recognize the many possible methods of implementation.

III. GROUND I – CLAIMS 1-4, 6-11, AND 13-21 ARE RENDERED OBVIOUS BY ONO AND CORBETT.

A. It Would Have Been Obvious to Combine Ono and Corbett.

6. In my opinion, the Petition clearly explains how and why a POSA would have combined the teachings of Ono and Corbett. Pet. 21-23, 31-33. Ono discloses a remote control or buttons on a projector that allow a user to select the

source of data to be transmitted. Ex-1005, ¶83. Corbett, in turn, describes a similar peripheral device that transmits data to an external device and recognizes that a user input device for triggering data transmission could be either displayed on a host computer or implemented as a physical actuator. Ex-1007, ¶¶17-20, 22-23. Both Ono and Corbett are from the same field of endeavor of peripheral devices for wireless data transmission and both are relevant to the problem of improving wireless transfer of data, which is also an issue addressed by the '951 patent. In my opinion, it would have been obvious to transfer media content data using either method, because there were a finite number of identified, predictable solutions for triggering media content transfer, and each option had the predictable result of transmitting media content data for display. This is also supported by other references cited in the Petition. *See also* Ex-1008, ¶19 (Ex-1012, 5:8-24); Ex-1009, ¶¶70-72.

7. Ono specifically acknowledges that it would be possible “for each presenter to carry out output on/off operations at each information terminal apparatus.” Ex-1005, ¶161. The full quote from this passage of Ono explains that, since the information terminal apparatus whose image is to be shown on the screen can be switched merely by operations from the remote controller of the image display apparatus, it is unnecessary for each presenter to carry out output on/off operations at each information terminal apparatus in accordance with the order. *Id.* As a result, the gap in time until the next presentation is eliminated, and presentations

can be conducted more quickly. *Id.* In my opinion, this does not teach away from having each user trigger transfer of media content. Allowing the presenter to switch control using the peripheral device would not render Ono inoperative for its intended purpose of allowing multiple computers to share their screens.

8. The Patent Owner argues that Corbett is not used for the transfer of arbitrary media content. POR, 24. However, in my opinion, nothing in Corbett prevents the data stored in the peripheral device from being arbitrary media content that a user wishes to share for display. More importantly, this argument does not address the combination presented in the Petition. The Petition explains that Ono discloses transmission of arbitrary media content that is triggered by a user action on an input device, while Corbett recognizes that a user input device that triggers data transmission could be displayed on a host computer or as a physical actuator coupled to the peripheral device. Pet. 31-33, 38-39. Ex-1007, ¶¶17-20, 22-23.

9. The Patent Owner also contends that there was no design need to modify Ono's peripheral device to include the input device. In my opinion, this is incorrect. Both Grimshaw and Uchida illustrate the desirability in the art and provide a specific design incentive to make the proposed modification to Ono's wireless communications module. Ex-1008, ¶¶19; Ex-1012, 5:8-24; Ex-1009, ¶¶70-72. Specifically, each describes an input device located on a peripheral device, where the input device is a physical actuator that triggers transmission of the user's

computer screen content to a shared display, providing a function similar to Ono's remote controller. *Id.*, Ex-1005, ¶¶7, 144. Thus, in my view, a POSA would have found it obvious to provide such an input device with the peripheral device in light of this known design incentive.

10. Overall, based on my expertise and understanding of the relevant technology and law, I believe that the combination of Ono and Corbett would have been obvious to a POSA, and the arguments raised by the Patent Owner do not change this conclusion.

B. The Ono-Corbett Combination Discloses “an input device...that triggers transfer of said user selected arbitrary media content”.

11. In my opinion, FIG. 9 of Ono clearly illustrates a process that begins with, and is therefore triggered by, a user pressing a button, which is then followed by an “image transfer” from a PC to a projector. The fact that a connection might fail in some circumstances is not relevant to whether the system meets the claim language. The '951 patent itself explains that its connection will fail in some instances. For example, when the button was previously in the “connected” state, the system checks the state of the base unit. Ex-1001, 11:43-48. If the base unit is not in the “full” state, the peripheral device will send the screen-scraped arbitrary media content to the base unit, which will then add the media content to the composition on the central display. *Id.* However, if the base unit is in the “full” state, the connection will fail. *Id.* This is further supported by the evidence that discusses

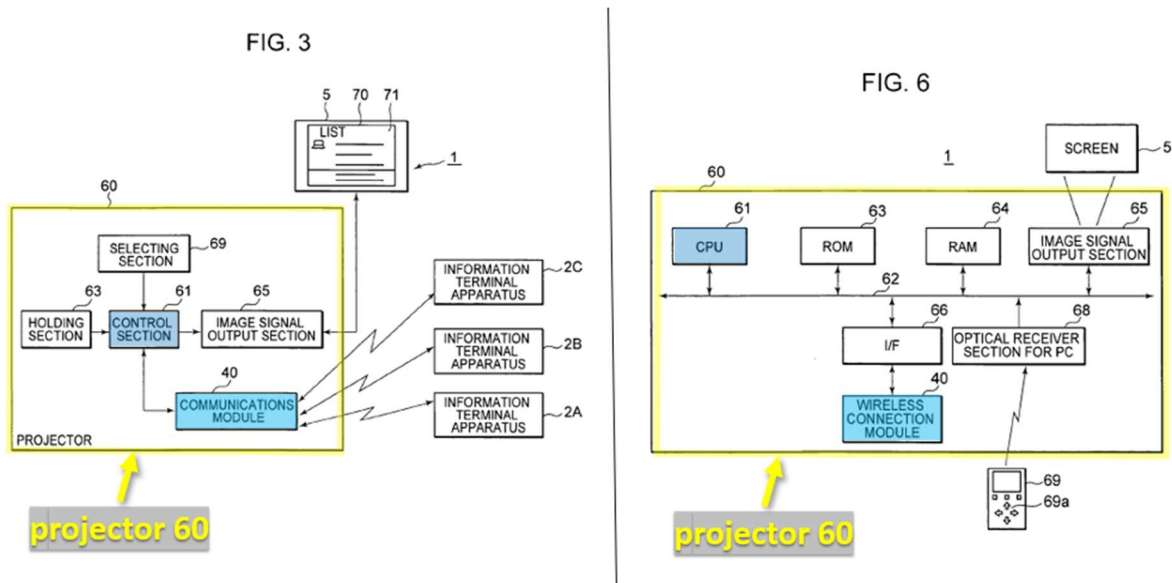
situations where a user is “blocked” from connecting, (Ex-1001, 11:43-48; Ex-1072, 31:19-34:22 (discussing Ex-1067, 43-44 (sometimes “you are blocked” from connecting))) and by Ex-1075 (“ClickShare Button connection issues”), which shows that the Patent Owner’s system could fail in several ways.

12. Therefore, in my opinion, the claims of the ’951 patent do not require 100% reliability when actuating the input device to trigger a transfer. As I have just explained, Ono itself discloses the possibility of using a button “for each presenter to carry out output on/off operations at each information terminal apparatus.” In my view, Grimshaw further supports the idea that Ono can have a button “at each information terminal apparatus.” This is consistent with the teachings of the prior art and with my understanding of how a POSA would interpret these systems.

C. The Ono-Corbett Combination Discloses the “*base node is integrated in the first display*”.

13. As explained in the Petition, Ono discloses that the control section 61, also referred to as central processing unit (CPU) 61 (the “*base node*”), is “*integrated in*” the image display apparatus 1 (the “*first display*”). See Ex-1005, ¶¶42-43, 50-52, 89, FIGS. 1-3, 6-7, 9; Ex-1002, ¶¶128-130. In my opinion, a POSA would have considered these elements to be “*integrated*” at least because the ’951 patent itself describes a similar base node-display arrangement as “*integrated*.” See Ex-1002, ¶¶128-130; Ex-1001, 15:40-41. As further explained in the Petition, a POSA would also have known that integration of components was a common design choice. This

approach would have reduced system complexity by eliminating the need for a separate wireless communications module and the need to couple it to the projector. A POSA would therefore have been motivated to make such a modification. *See* Pet., 33-34.



Ex-1005, FIGS. 3, 6.

14. The Patent Owner's argument that this limitation is not disclosed by Ono depends on a POSA believing that a "projector is not a display." POR, 28. In my opinion, this is contrary to both the common understanding in the field and the teachings of the '951 patent. A projector is a type of display. More importantly, the '951 patent itself expressly states that "The display 44 may be a projector and screen." Ex-1001, 14:37-38. The '951 patent also clarifies, with respect to a fifth embodiment, that "In this embodiment, the base node is not realized as a separate physical box, but [is] **integrated into the processing unit inside a display or**

projector.” Ex-1001, 14:37-38 (emphasis added). Based on this, it is my opinion that a POSA would understand that, when the display is a projector and a screen and the “*base node is integrated in the first display*,” the base node is integrated in the projector without requiring the base node to also be integrated into the screen. Therefore, the “base unit” (wireless connection module 40) is “*integrated*” in the “*first display*” (projector 60), as shown in FIGS. 3 and 6 of Ono

IV. GROUND II – CLAIMS 1-10 AND 14-21 ARE RENDERED OBVIOUS BY UCHIDA AND GRIMSHAW.

A. It Would Have Been Obvious to Combine Uchida and Grimshaw.

15. In my opinion, the Patent Owner's arguments address a modification of Uchida and Grimshaw that was not presented in the Petition. Rather than focusing on the actual grounds set forth in the Petition, the POR emphasizes features related to updating wireless setting information using a remote control in Uchida and seems to suggest that these features would be removed by a combination of Uchida and Grimshaw. However, this is not the combination presented in the Petition. The Petition explains that Uchida discloses a “*peripheral device*” (wireless device 1) that includes “*an input device*” (image transfer stop switch 140) “*configured to allow the user to carry out a user action on the input device that triggers transfer*” (for example, sliding switch 140 to trigger transfer) “*of said user selected arbitrary media content ... the input device being a physical actuator*” (such as slide switch 140) “*coupled to the at least one peripheral device*” (wireless device 1). See Ex-

1009, ¶¶10-13, 39-40, 70-72, 134, 139, 176, FIGS. 1-3; Ex-1002, ¶¶161-168, 180-182; Pet., 57-58. Grimshaw, in my view, simply further discloses another system in which an input device that triggers transfer of media content is a physical actuator on a peripheral device.

16. The Patent Owner also argues that centralization of the image sharing process is critical to the functioning of Uchida. POR, 42. In my opinion, this is not correct. Uchida merely states that “wireless setting information can be updated every time the image projection device is used,” but does not provide any indication or suggestion that control of media content transfer must be centralized. Ex-1009, ¶31. Uchida, ¶31, describes updating wireless setting information for new conferences to prevent image sharing from devices that participated in a previous conference. The proposed modification of Uchida based on Grimshaw does not remove the ability to update wireless connection information for new conferences. In my opinion, triggering the transfer of media content is a separate consideration from updating the wireless setting information for a new conference. Furthermore, performing this update with a remote control does not teach away from allowing the presenter to switch control using an input device coupled to the peripheral device. Including such control would not render Uchida inoperative for its intended purpose of facilitating communication between a computer device and an image projection device. *See* Ex-1009, Abstract.

17. Furthermore, my statement that “I have not specifically looked [into the origin for wireless setting information]” is consistent with the grounds that are actually presented in the Petition. POR, 43. As I explained above, how wireless setting information is updated is irrelevant to the inclusion of “*an input device...that triggers transfer of...media content*” as part of a “*peripheral device,*” and the claims do not even include limitations related to how wireless setting information is updated.

B. The Uchida-Grimshaw Combination Discloses “an input device...that triggers transfer of said user selected arbitrary media content”.

18. In my opinion, the Patent Owner's argument that the image transfer stop switch of Uchida does not trigger transfer of media content is incorrect. POR, 44-45. First, as I understand the record, Dr. Brogioli admitted that “when the toggle is turned back to ‘off,’ the image data coming from the wireless device is projected again.” Ex-1072, 3:3-12. This statement, in my view, directly supports the conclusion that toggling the switch triggers the transfer of image data.

19. Second, Uchida itself teaches that after activating the “image transfer stop switch 140,” the client computer “executes an image transfer application and transmits a request to the image projection device 3 ... to project a specific image ... on the image projection device 3.” Pet., 57–58, citing Ex-1009, ¶71.) In my

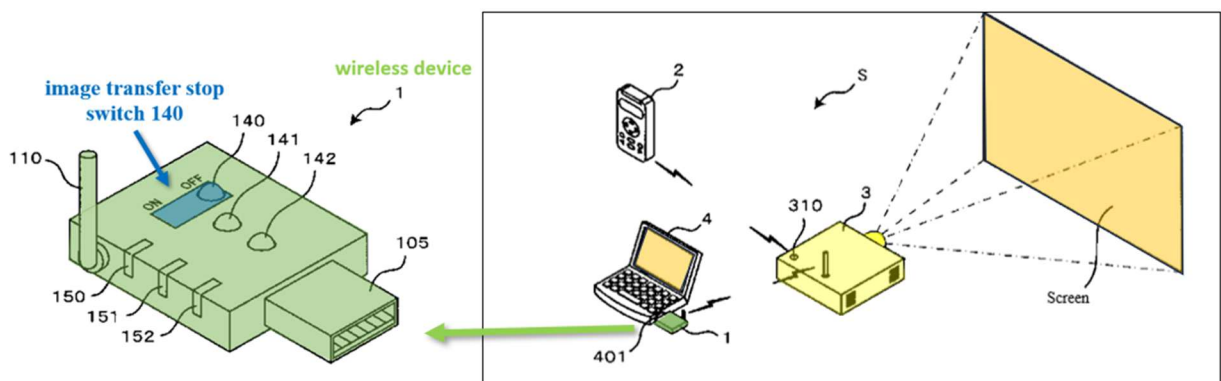
opinion, this means that the switch is used to initiate or trigger the transfer of image data for projection.

20. Additionally, Grimshaw demonstrates that a user can push a button on a user module to trigger the transmission of image data. Pet., 58-59. In my view, the fact that there may be other device components in the data transfer pathway in Grimshaw does not change the fact that Grimshaw clearly discloses the use of buttons to trigger transmission. For example, Grimshaw describes that a user may engage or push a button 344, 354, 364, or 374 on their user module in order to take control of the display module 22, so that the display module could show whatever is currently being displayed on the screen of the laptop computer connected to the selected user module. Ex-1008, ¶¶19-20; Ex-1012, 5:8-6:17. Therefore, in my opinion, the combination of Uchida and Grimshaw renders obvious the “input device” limitation.

21. As I also addressed above in § Section IV.A, the Patent Owner's arguments are based on an improper reading of Uchida that incorrectly links (1) the updating of wireless setting information to prevent unwanted image sharing from previous users, to (2) the triggering of image transfer by moving the image transfer switch to a position that allows and thus triggers image transfer. As explained in the Petition, Uchida discloses that “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, ¶¶71; Pet. 58.

22. In my opinion, since moving the switch to the “ON” position stops image transfer, a POSA would have understood that sliding it back to the “OFF” position resumes, and thus triggers, image data transmission. Ex-1009, ¶¶70-72; Ex-1002, ¶¶162, 180-182; Pet. 58. This understanding follows from the common design principle in electronics and computing, where toggling a control between two states alternates the system between two corresponding modes of operation. It is also common practice that a toggle or slide switch, like switch 140, that enables or disables a function will, when returned to its original position, restore the function to its prior state. In this case, the function in the prior state is to allow or trigger the transfer of image data.

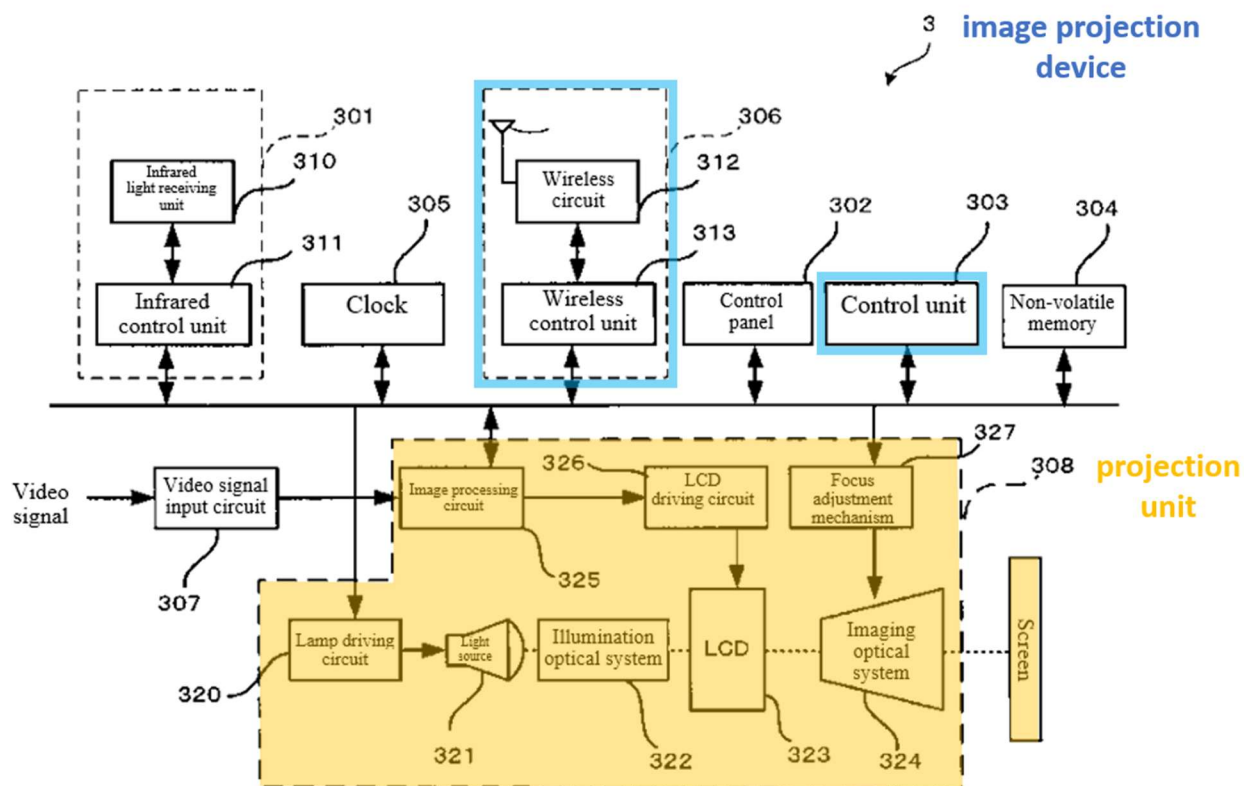


Ex-1009, FIGS. 1, 3.

23. As also described above, the Patent Owner mischaracterizes the teachings of Uchida at ¶31, which describes updating wireless setting information for new conferences to prevent image sharing from devices that participated in a previous conference. In my opinion, these teachings are not necessarily tied to any operation of the image transfer stop switch. The switch can be actuated to stop or trigger media content transfer for display after the wireless settings are in place. Therefore, I believe the Patent Owner's arguments do not accurately reflect the teachings of Uchida or the understanding of a POSA.

C. The Uchida-Grimshaw Combination Discloses the “*base node is integrated in the first display*”.

24. Uchida indicates that the “image projection device 3” (the “*display*”) “includes... a wireless unit 306” (the “*base node*”) “and a projection unit 308...**all of which are built into the housing.**” Ex-1009, 124 (emphasis added), FIG. 14 (reproduced below). In my opinion, a component built into the housing of a device is “*integrated in*” that device. The term “integrated” is commonly used to describe components that are physically and functionally combined within a single unit or enclosure, and this understanding is consistent with the teachings of the '951 patent itself. Ex-1001, 15:40-41.



Ex-1009, FIG. 14.

25. The Patent Owner's argument that this limitation is not disclosed by Uchida depends on a POSA believing that the image projection device 3 is not a display because "projector unit 308, does not include the screen." POR, 46. However, in my opinion, this is contrary to the common understanding in the field. A POSA would recognize that the image projection device 3 in Uchida is a display. Furthermore, the image projection device 3 does include a screen, as shown in FIG. 14 of Uchida.

26. Importantly, the '951 patent itself indicates, with respect to a fifth embodiment, that "In this embodiment, the base node is not realized as a separate

physical box, but [is] integrated into the processing unit inside a display or projector.” Ex-1001, 14:37-38 (emphasis added). Based on this, it is my opinion that a POSA would understand that, when the display is a projector and a screen and the “*base node is integrated in the first display*,” the base node is integrated in the projector without requiring the base node to also be integrated into the screen.

V. GROUND III – CLAIMS 1-2, 6-10, 13, 15-17, AND 19-21 ARE RENDERED OBVIOUS BY ICHIEDA.

A. It Would Have Been Obvious to Modify Ichieda.

27. Ichieda describes a third embodiment (Embodiment 3) in which an image display system 1 includes a projector 50, a laptop personal computer (PC) 90 (which serves as the image supply device), and an information terminal 80 (which is a cellphone). Ex-1006, ¶129. After data from the information terminal 80 is used to pair the laptop PC 90 to the projector 50, Ichieda indicates that the laptop PC 90 can transmit the image signal via communication section 96 to access point 70. Ex-1006, ¶150, FIG. 12 (reproduced below).

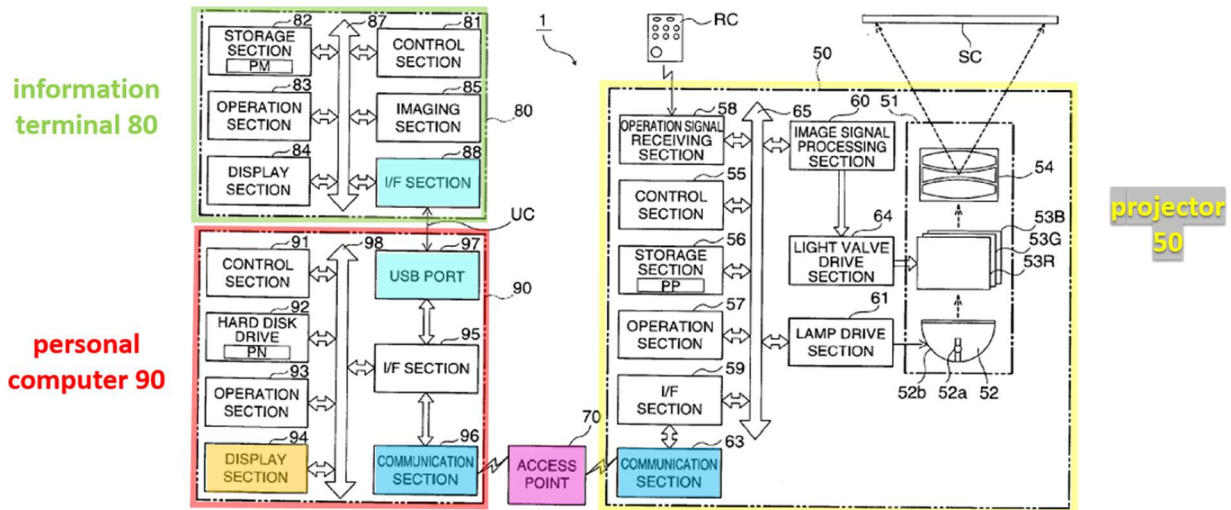
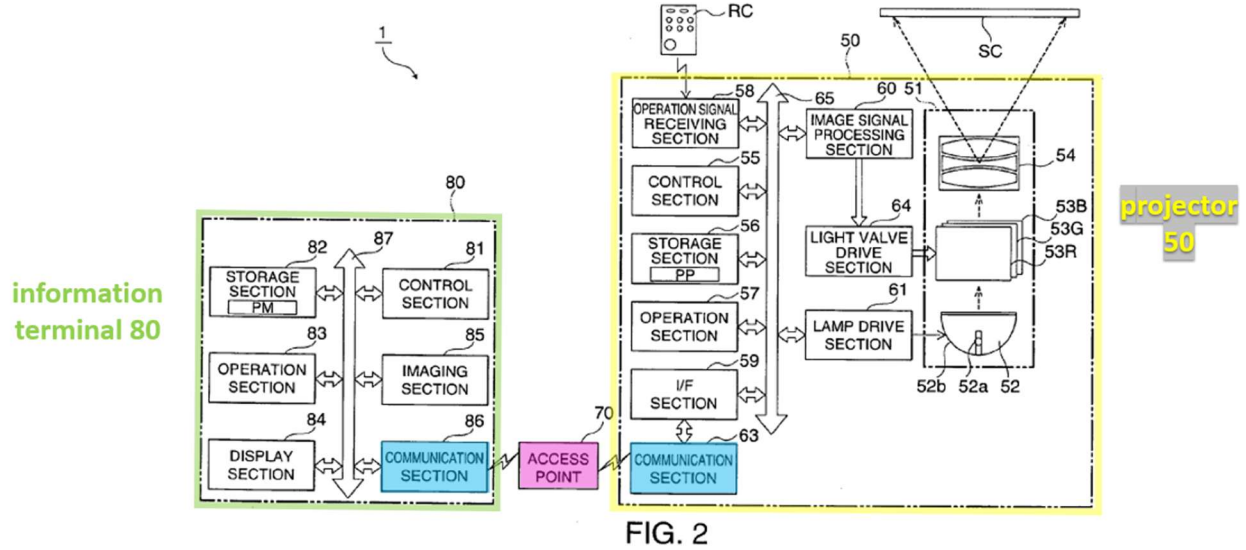


FIG. 12

Ex-1006, FIG. 12.

28. However, in my opinion, Ichieda is not limited to this particular option for routing image data for transfer to the projector 50 via the communication section 96 of the PC 90. Instead, Ichieda provides a limited number of other readily implementable options that a POSA would reasonably consider. In particular, Ichieda also explains that data can be sent back through the information terminal 80 via USB port 97 to the interface section 88 of the information terminal 80, and that a communication section 86 of the information terminal 80 can be used to transfer data to the projector 50. Ex-1006, ¶¶44, 72, 104, 136-137, FIG. 2 (reproduced below). In my opinion, a POSA would recognize that it would be obvious to employ this known option when faced with a design need, such as the example of freeing the network card of the laptop PC 90 from use, as described in the Petition. Pet. 71.

29. At the time the application for the '951 patent was filed, freeing a network card from use was known to have advantages, such as improved data security and increased device functionality. For example, connecting the laptop PC 90 directly to a public network in a conference setting, as in Uchida, might make the laptop PC 90 more vulnerable to attacks and could expose sensitive or personal data stored on the laptop PC. Furthermore, freeing the network card may allow users to share media content via the information terminal 80, while the communication section 96 is available for other purposes, such as connecting to the internet. *See, e.g.,* Ex-1053, 1 (“The really smart thing about Quicklink TV is multi-tasking. Whilst streaming content to your TV [using the wireless USB adapter] you can also continue using your Laptop, Netbook* or Desktop PC as normal for work or leisure including the Internet - both at the same time!” (emphasis added)). In my opinion, employing this data routing option from Uchida is simply a combination of known elements in a predictable manner, based on known marketing and design incentives. The modification would result in the expected outcome of transferring media content from the laptop PC 90 to the information terminal 80 and then to the projector 50 via communication section 86.



Ex-1006, FIG. 2.

30. In the modified arrangement of Ichieda, pressing a button on operation section 83 “triggers transfer of...media content.” Ex-1006, ¶¶44, 60, 69 (“The operation section 83 is equipped with a plurality of operation buttons for performing various instructions to the information terminal 80 [such as] ‘a connection button’ for instructing the wireless LAN connection...”), 81-83, 107, FIGS. 3, 7, 13; Ex-1002, ¶¶228-229. As illustrated in the various processes shown in Figures 3, 7, and 13 of Ichieda, the image signal is sent once a connection is established, regardless of whether the image signal is sent from the PC 90 or the information terminal 80. *Id.* In my opinion, this demonstrates that the system is flexible and that the triggering of image transfer is not limited to a single device or pathway.

B. Ichieda Discloses “an input device...that triggers transfer of said user selected arbitrary media content”.

31. The Patent Owner's argument concerning this limitation is similar to the arguments made regarding the combination of Ono and Corbett. *See* § III.B. As I have explained, the fact that a connection might fail in some circumstances is not relevant to whether the system meets the claim language. Ichieda clearly illustrates a process that begins with a user pressing a button and is then followed by an “image transfer” from a laptop PC 90 to a projector 50.

32. Indeed, the '951 patent itself explains that its connection will fail in some instances. For example, when the button was previously in the “connected” state, the system checks the state of the base unit. Ex-1001, 11:43-48. If the base unit is not in the “full” state, the peripheral device will send the screen-scraped arbitrary media content to the base unit, which will then add the media content to the composition on the central display. *Id.* However, if the base unit is in the “full” state, the connection will fail. *Id.* This is further supported by the evidence cited in Ex-1067, which discusses situations where a user is “blocked” from connecting, and by Ex-1075, which shows that the Patent Owner's system could fail in several ways.

33. Therefore, in my opinion, the claims of the '951 patent do not require 100% reliability when actuating the input device to trigger a transfer. Ichieda, in my view, discloses the “*triggers transfer*” limitation because it shows a process where a user action (pressing a button) initiates the transfer of media content, even if the

transfer may not always succeed due to system conditions. This understanding is consistent with how a POSA would interpret the operation of such systems, based on the disclosures in both the prior art and the '951 patent itself.

C. Ichieda Discloses the “*base node is integrated in the first display*”.

34. As I addressed in § III.C and IV.C above, the Patent Owner's arguments once again incorrectly depend on the idea that a POSA would not consider a projector to be a display. This is not correct for the same reasons already explained. Ichieda specifically states that “The projector 50 is an image **display device**” (that is, the “display”). Ex-1006, ¶44 (emphasis added). The projector 50 includes both an integrated communication section 63 and a control section 55, which together serve as the “*base node*” and are built-in to the projector 50. Ex-1006, ¶¶50, 60 (“[T]he communication section 63 can be arranged to use ... a wireless [LAN] module previously **built-in** in the projector 50.” (Emphasis added)), 162, FIGS. 2, 12; Ex-1002, ¶230. In my opinion, a component built-in the projector “*integrated in*” the projector. The term “integrated” is commonly used to describe components that are physically and functionally combined within a single unit or enclosure, and this understanding is consistent with the teachings of the '951 patent itself. Ex-1001, 15:40-41.

35. Ichieda also discloses a screen (SC) that is used together with the projector 50. Importantly, the '951 patent itself, when describing a fifth embodiment,

states that “In this embodiment, the base node is not realized as a separate physical box, but [is] integrated into the processing unit inside a display or projector.” Ex-1001, 14:37-38 (emphasis added). In my opinion, this means that a POSA would understand that, when the display is a projector and a screen, and the “*base node is integrated in the first display*,” the base node is integrated in the projector. There is no requirement for the base node to also be integrated into the screen.

36. Therefore, I believe Ichieda discloses the limitation that the “*base node is integrated in the first display*.” A POSA would recognize that the projector, as described in Ichieda, is a display, and that the base node is integrated within it, consistent with both the prior art and the language of the '951 patent.

VI. CONCLUSION

37. My opinions are based upon the information that I have considered to date. I am unaware of any evidence of secondary considerations with respect to the '951 patent that would render any of the asserted claims non-obvious. I reserve the right, however, to supplement my opinions in the future to respond to any arguments raised by the owner of the '951 patent and to consider new information that becomes available to me.

38. I declare that all statements made herein of my knowledge are true, and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the

like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

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