

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

U.S. PATENT NO. 11,422,951

**PATENT OWNER'S OBJECTIONS TO
PETITIONER'S EVIDENCE FILED WITH REPLY**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner hereby submits the following objections to the evidence Petitioner filed with its Reply dated October 15, 2025. (Paper 28). Patent Owner's objections apply equally to Petitioner's reliance on these Exhibits in the Reply and any subsequently-filed papers in this proceeding. These objections are being filed within five business days of service.

Patent Owner makes the following objections of the following exhibits:

Exhibit 1067	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1068	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1069	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1074	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1075	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1076	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1077	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1079	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1080	Relevance (FRE 401 & 402) Authenticity (FRE 901)

	Foundation (FRE 602)
Exhibit 1081	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1082	Hearsay (FRE 801 & 802) Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1084	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1085	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)
Exhibit 1091	Relevance (FRE 401 & 402) Authenticity (FRE 901) Foundation (FRE 602)

Exhibits 1068, 1069, 1074, 1079, 1080, 1081, and 1085 are not cited in any of Petitioner's papers in this proceeding and are therefore irrelevant to this proceeding. Accordingly, these Exhibits are inadmissible under FRE 401 and 402 because they do not relate to a fact that is of consequence in determining the action. Moreover, each of these exhibits lacks any foundation and, as a document that is not self-authenticating, there is no basis to conclude any of Exhibits 1067, 1068, 1069, 1074, 1075, 1079, 1080, 1081, and 1085 are what Petitioner purports them to be.

Exhibits 1067 and 1075, while cited in Petitioner's Reply, are not tied to the proposition in the preceding sentence. These exhibits purport to relate to Patent Owner's products, but are cited for the proposition tied to prior art references unrelated to Patent Owner, rendering these exhibits irrelevant. Moreover, each of

these exhibits lacks any foundation and, as documents that are not self-authenticating, there is no basis to conclude any of Exhibits 1067 and 1075 are what Petitioner purports them to be. Accordingly, these Exhibits are inadmissible under FRE 401 and 402 because they do not relate to a fact that is of consequence in determining the action.

Exhibits 1076 and 1077 are cited three times in the Reply, but are not tied to the proposition in the preceding sentence. Moreover, each of these exhibits lacks any foundation and, as documents that are not self-authenticating, there is no basis to conclude any of Exhibits 1076 and 1077 are what Petitioner purports them to be. Accordingly, these Exhibits are inadmissible under FRE 401 and 402 because they do not relate to a fact that is of consequence in determining the action.

Exhibit 1082 is hearsay, as it is an out of court statement being used to establish the truth of the matter asserted. There is no applicable hearsay exception that would apply to this document, and certainly not to the specific portions relied upon by the Reply. The exhibit lacks any foundation and, as a document that is not self-authenticating, there is no basis to conclude Exhibit 1082 is what Petitioner purports it to be. Accordingly, Exhibit 1082 is inadmissible under FRE 401 and 402 because it does not relate to a fact that is of consequence in determining the action.

Exhibits 1084 and 1091 are from an entirely different proceeding with different issues at play, different burdens of proof, and different audiences. Each of

these exhibits lacks any foundation and, as documents that are not self-authenticating, there is no basis to conclude any of Exhibits 1084 and 1091 are what Petitioner purports them to be. Accordingly, these Exhibits are inadmissible under FRE 401 and 402 because they do not relate to a fact that is of consequence in determining the action.

To the extent Petitioner fails to correct the evidentiary defects associated with the above evidence in view of Patent Owner's objections, Patent Owner reserves the right to file one or more motions to exclude the exhibits or portions thereof under 37 C.F.R. § 42.64(c).

Respectfully submitted,

Dated: October 22, 2025

By: /Erik Halverson/
Erik Halverson
Reg. No. 73,552
K&L GATES LLP
4 Embarcadero Center, Suite 1200
San Francisco, CA 94111
erik.halverson@klgates.com
T: (415) 882-8238
F: (415) 882-8220

Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2025, I caused a true and correct copy of the foregoing to be served on the following counsel of record for Petitioners by electronic mail to the following addresses:

Stephen Yang
stephen.yang@dentons.com
Kevin R. Greenleaf
kevin.greenleaf@dentons.com
Timothy C. Bickham
timothy.bickham@dentons.com
Forrest Gothia
forrest.gothia@dentons.com
Dentons US LLP
233 South Wacker Drive,
Suite 5800
Chicago, IL 60606
Tel: (212) 398-4890
Fax: (212) 768-6800
Email: ipt.docketchi@dentons.com

By: /Erik Halverson/
Erik J. Halverson
Reg. No. 73,552