



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 RESPONSE

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Exhibits

Exhibit Number	Description
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”)
Ex. 2004	Declaration of Dr. Michael Brogioli
Ex. 2005	Curriculum Vitae of Dr. Michael Brogioli
Ex. 2006	June 30, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01436
Ex. 2007	July 1, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01439
Ex. 2008	July 2, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01437
Ex. 2009	July 2, 2025 Deposition Transcript of Kevin C. Almeroth IPR2024-01438
Ex. 2010	Barco Sales Data (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2011	Crestron License Agreement (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2012	<i>Barco and Crestron announce patent license agreement regarding a set of essential ClickShare patents</i> , BARCO (Sept. 12, 2023) https://web.archive.org/web/20240810204702/https://www.barco.com/en/about/press-releases/barco-and-crestron-announce-patent-license-agreement-regarding-a
Ex. 2013	<i>ClickShare conferencing & collaboration</i> , BARCO (April 1, 2025), https://web.archive.org/web/20250401012647/https://www.barco.com/en/products/clickshare-conferencing-collaboration#expand

Exhibit Number	Description
Ex. 2014	<i>ClickShare Button</i> , BARCO (February 12, 2025) https://web.archive.org/web/20250212164931/https://www.barco.com/en/product/clickshare-conferencing-button
Ex. 2015	ECF 65, Joint Claim Construction and Prehearing Statement, <i>Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al</i> , 2:2023-cv-521 (E.D. Tex. 11/14/2023)
Ex. 2016	ECF 89, Claim Construction Order, <i>Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al</i> , 2:2023-cv-521 (E.D. Tex. 11/14/2023)
Ex. 2017	List of Products Covered by Barco Patents accessible at: https://www.barco.com/en/about/terms-conditions/patents
Ex. 2018	<i>Patent</i> , CRESTRON (June 12, 2025) https://www.crestron.com/legal/patents?page=1
Ex. 2019	Crestron Electronics Private Company Profile, PITCHBOOK
Ex. 2020	ECF 55, Consent Judgment and Permanent Injunction, <i>Barco, Inc. et al v. Vivitek Corporation et al</i> , Case No. 4:19-cv-3250 (N.D. Cal. 4/27/2020)
Ex. 2021	<i>Barco Successfully enforces ClickShare IP against competitors in the U.S.</i> , BARCO (May 26, 2020) https://web.archive.org/web/20240424230846/https://www.barco.com/en/about/press-releases/2020-05-26-barco-successfully-enforces-cs-ip-against-competitors-in-the-us
Ex. 2022	Paul Krzyzanowski, <i>Devices</i> , PK.ORG (updated March 24, 2011).
Ex. 2023	Excerpts from April 18, 2025 Deposition Transcript of Andrew Ludke (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2024	<i>USB device class drivers included in Windows</i> , MICROSOFT (Apr.

Exhibit Number	Description
	9, 2025) https://web.archive.org/web/20250409210411/https://learn.microsoft.com/en-us/windows-hardware/drivers/usbcon/supported-usb-classes
Ex. 2025	Reserved
Ex. 2026	Dr. Kevin Almeroth's Declaration in IPR2024-01437
Ex. 2027	Dr. Kevin Almeroth's Declaration in IPR2024-01438
Ex. 2028	Reserved
Ex. 2029	Reserved
Ex. 2030	Dr. Kevin Almeroth's Declaration in IPR2025-00597
Ex. 2031	Reserved
Ex. 2032	Modified Protective Order

I. INTRODUCTION

U.S. Patent No. 11,422,951 (the “’951 Patent”) describes and claims systems and tools for communicating arbitrary media content from users at a meeting using a peripheral device and a base node connected to a display. *See e.g.*, Ex. 1001, Cls. 1, 9, 16, 21. The ’951 Patent recognizes administrative and logistical hurdles involved in conducting meetings and addresses them with a novel solution. These hurdles include 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—all of which impede the ability to hold successful meetings. *Id.*, 4:43-60.

The ’951 Patent, unlike the references relied on in each petitioned Ground, offers a novel solution which greatly simplifies administrative hurdles of conducting a meeting available to all participants without sacrificing security.

The Petition presents three separate grounds to challenge the claims of the ’951 Patent. In its Institution Decision, the Board noted that Patent Owner’s arguments relating to Ground 1 and Ground 3 were likely persuasive, siding with Patent Owner. Institution Decision (Paper 12) at 20, 23. For at least the reasons outlined in the Institution Decision, the challenge of those two grounds fails.

Moreover, as set forth in greater detail below, each of the petitioned grounds exhibit significant flaws and the Board should uphold the patentability of all claims.

Ground 1, which the ID already found fails, relies on a combination of *Ono* and *Corbett*. However, a POSITA would not be motivated to make the combination advocated in the Petition as it would fundamentally alter *Ono*'s operation, something unaddressed in the Petition. Further, even if the combination were made, *Ono* and *Corbett* fail to teach all aspects of the claimed invention.

Ground 3, which the ID already found fails, relies on separate embodiments of *Ichieda*. This ground is flawed in that the Petition provides a single conclusory sentence not supported by evidence on why a modification to *Ichieda* would be made. Further, this motivation, even if accepted, would not result in a system which teaches all elements of the challenged claims.

Ground 2 proposes a combination of *Uchida* and *Grimshaw*. This combination is flawed in that the Petition fabricates an issue in *Uchida* with “multiple uses vying for control” that is unsupported by *Uchida*'s system. The Petition further inappropriately relies on a “stop transfer switch” as a trigger that transfers content.

Finally, certain objective indicia of non-obviousness present in this case strongly favor a finding of non-obviousness. The '951 Patent has been successfully licensed, is commercially successful, and the technology embodied therein has

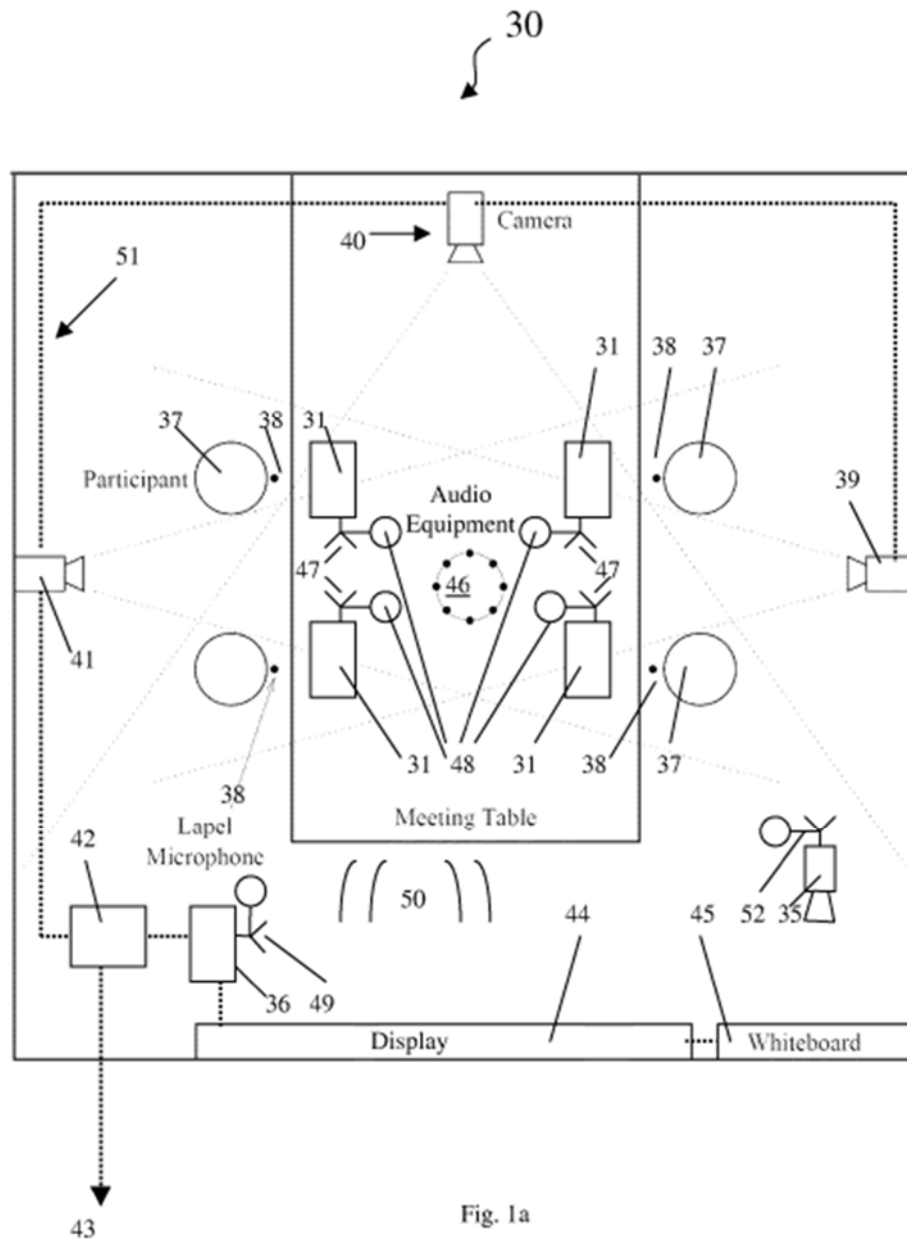
garnered praise by others. In light of the weakness of the Petition's obviousness theories and the clear evidence of secondary indicia of non-obviousness, the Board should uphold the patentability of each of the challenged claims.

II. THE '951 PATENT

A. Overview

The inventors of the '951 Patent recognized a need to improve presenting and collaboration in a meeting-setting. Ex. 1001, 13:41-55, 3:22-4:62; Ex. 2004, ¶51. Prior presentation systems relied on cabled connections, LAN communications, or specialized software. Ex. 1001, 3:22-4:19; Ex. 2004, ¶51.

Figure 1a depicts a meeting room 30 where multiple participants 37 with processing devices (e.g., laptops) 31 are coupled to peripheral devices (also described as connection units) 47 adapted to communicate media content to a base node 36 connected to a display 44:



Ex. 1001, 13:56-62, 14:37-39, 15:33-36, Fig. 1a; Ex. 2004, ¶52. The user processing device 31, peripheral devices 47, and base node 36 form a communication network for communication presentation data to the central display 44. Ex. 1001, 15:55-59; Ex. 2004, ¶52.

The peripheral device may include various features, such as a portable application, a processing engine, a wireless transmitter, a plug and play interface, and a button. Ex. 1001, 21:11-14, 21:23-30. A user can connect the peripheral device to a port of its processing device to facilitate communication between the processing device and a central display. Ex. 1001, 22:14-19; Ex. 2004, ¶53.

A software application stored on the peripheral device is configured to run on the processing device and assists with the capture of video data on the processing device. Ex. 1001, 18:23-28. The software application is implemented as a portable application, so it leaves a zero-footprint on the processing device once the peripheral device is disconnected. Ex. 1001, 17:47-52; Ex. 2004, ¶54

The base node receives the data, completes any necessary decoding or unpacking, synchronizes the data and shares it via the display and other output devices (such as speakers). Ex. 1001, 14:34-37, 19:16-23; Ex. 2004, ¶55.

None of the cited references teach all aspects of the challenged claims. Ex. 2004, ¶55; *see generally*, Ex. 1005; Ex. 1006, Ex. 1007; Ex. 1008; Ex. 1009. Accordingly, the references relied upon in the Petition do not render obvious the challenged claims of the '951 Patent.

B. Device Drivers

The '951 Patent relies on an operating system's pre-installed generic drivers. *See e.g.*, Ex. 1001, C1 5. While drivers are also software, drivers differ from

computer applications and operating systems in that they are specialized “translators” to allow different systems to communicate with each other. Ex. 2004, ¶; Ex. 2006, 8:24-9:6.

An operating system is the system level software used to manage the hardware and software resources of a given computer. Ex. 2004, ¶58. It is responsible for the management of memory, file systems, computer networking functionality, and user interfaces, among other key functions. Ex. 2004, ¶58. It also provides the foundation which computer applications can run on. Ex. 2004, ¶58. Common operating systems include Window, MacOS, Android, iOS, and Linux. Ex. 2004, ¶58.

Software applications are specific computer programs designed to perform user oriented or user-facing tasks. Ex. 2004, ¶59. Examples include web browsers, media players, and productivity applications. Ex. 2004, ¶59.

Drivers on the other hand are designed to control hardware connected to a computer, and they allow the operating system and computer applications of a given machine to interact with the connected hardware. Ex. 2022; Ex. 2004, ¶60. Drivers function as translators between the underlying hardware and the software layers of the operating system and applications themselves. Ex. 2004, ¶60. This way, the operating system and applications do not need to know they are accessing one type of device over another (e.g., a USB memory device rather than a memory disk) and

can instead leave the specific translation to the driver, allowing the operating system and application to be agnostic to the specific mouse, keyboard, or USB memory device that is connected to the machine, treating them as simply a “human interface device” or a “storage device.” Ex. 2022; Ex. 2004, ¶60.

Drivers are operating system specific—they must operate with and conform to the given operating system’s device driver architecture. Ex. 2004, ¶61. A driver that is designed to work with a large variety of devices is called a generic driver. Ex. 2022; Ex. 2004, ¶61. Drivers may come already installed on commercial operating systems, and in such a situation would be referred to as “pre-installed drivers.” Ex. 2004, ¶61. One example of a pre-installed generic driver is a USB driver. USB devices have different USB device classes. Ex. 2024, 1. Devices are grouped into classes, and these USB device classes are categorized based on the characteristics of the devices and common functions they perform. Ex. 2024, 1. Operating systems, such as the Microsoft Windows operating system provide support for some device classes with their pre-installed drivers. Ex. 2024, 1, 3-8 (listing Microsoft-provided USB device class drivers); Ex. 2004, ¶61. When supported devices are connected to a computer, the operating system will automatically call the required class driver and the supported device will function without additional drivers being installed. Ex. 2024, 1; Ex. 2004, ¶62. The class drivers are configured with the device class purpose in mind so that they may suitably handle the volume and speed of data

transfer. Ex. 2004, ¶61; Ex. 2006, 104:3-105:10. Different class drivers also have different command structures and communications protocol to suit these purposes. Ex. 2004, ¶62.

When certain device capabilities are not supported by the drivers for a given class that are provided by the operating system, a vendor may design a custom or specific driver which can then be installed on a computer to support said functionality. Ex. 2024, 2; Ex. 2004, ¶63. These drivers are considered to be “special purpose” in that they are unique to a given piece of hardware. Ex. 2004, ¶63; Ex. 2006, 13:12-18, 15:12-17.

C. Claim Construction

In *Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al*, 2:2023-cv-521 (E.D. Tex. 11/14/2023), the parties have submitted a Joint Claim Construction Statement (Ex. 2015) which included certain agreed constructions and further briefed and argued other claim terms. The court in that case issued a Claim Construction Order construing certain other claims. Ex. 2016. Claims construction here should not conflict with the construction in the District Court. *KioSoft Techs., LLC v. PayRange, Inc.*, IPR2021-00086, Paper 12, at 16 (PTAB Mar. 22, 2021) (“subsequent decisions issued in reliance on these inconsistent claim constructions may lack ‘uniformity’ between us and the district court and may undermine the ‘predictability’ of the [challenged] patent’s scope and the ‘integrity of the patent

system’ overall.”) While the claims of the ’951 Patent are not rendered obvious under any reasonable construction of its claim terms, Patent Owner proposes the following clarifications and interpretations of certain terms:

1. “arbitrary media content” (Claims 1, 9, 16, 21)

The district court has ruled that *arbitrary media content* means “Media content that is generated, created, or selected that is appropriate for display[.]” Ex. 2015, 7.

2. “couple” / “coupling” / coupled (Claims 1, 9, 16, 21)

Petitioner only proposes a claim construction for the term “coupled” in claim 16. Petition, 11. However, each of “couple” / “coupling” / “coupled” should be interpreted consistent with the district court’s construction for each instance of this term. The parties agreed in the district court that *couple* and *coupling* means “Connect[ing] two devices, either directly or indirectly.” Ex. 2015, 7. *Coupled* should be interpreted consistent with this understanding.

3. “wireless communications network” (Claims 1, 6, 7, 9, 16, 19, 21)

Petitioner only proposes a claim construction for the term “*wireless communications network*” in claim 16. Petition, 11. Each instance of this term should be construed consistently, including those in Claims 1, 6, 7 9, 19, and 21, which also recite this term.

D. Level of Ordinary Skill in the Art

Petitioner provided the following level of skill for this proceeding: at least a Master's Degree in Electrical Engineering and five years of work experience in computer science and embedded systems, or a Master's Degree in Computer Science and five years of work experience in electrical and computer engineering and embedded systems, and that additional educational experience could substitute for some of the work experience. Petition, 10. Patent Owner does not dispute this level of skill in the art and submits that Dr. Brogioli meets this level and can provide helpful testimony for this case. Ex. 2004, ¶¶1-50, 56; Ex. 2005.

E. Dr. Almeroth Opinions Should Not Be Afforded Weight

Dr. Almeroth did not reliably provide consistent opinions across the seven IPR challenges against Patent Owner's patents, so his opinions regarding the validity of each challenged patent should be afforded little weight.

First, Dr. Almeroth provides inconsistent opinions regarding his technical knowledge of the patented technology. This is clear from his treatment of drivers and data communications across the challenges. When asked about specific types of data and drivers, Dr. Almeroth stated: "[d]ata is data; right? So whether it's real-time audio/video, whether it's audio/video from a file, whether it's video scraped off a screen, its source doesn't affect the use of the transfer channels that can be created." Ex. 2006, 101:1-5. Dr. Almeroth further noted "[i]t's kind of what I described

earlier, a way of using a basic interface or a mode and then *data is data* and you can send it. And once it's received, the device can do anything it wants with it.”¹ Ex. 2006, 121:15-17. However, in his declaration submitted in IPR2025-00597, Dr. Almeroth indicates that the type of data impacts the way in which the data can be communicated. Ex. 2030, ¶¶212-213. Specifically, Dr. Almeroth states “a POSA would recognize and find it obvious in the art that data is conventionally scaled, transcoded, or mixed *based on a type of functional data* it represents, such on whether the data is audio data, visual data, or another type of data.” (emphasis in original). Ex. 2030, ¶212. Further, he explains that “A POSA would recognize and understand that codecs, which were well-known in the art, are specific to data type, such as whether the data being compressed, decompressed, encoded, or decoded is audio data, visual data, *etc.*” (emphasis in original). Ex. 2030, ¶213.

Even though Dr. Almeroth alleges “data is data...its source doesn't affect the use of the transfer channels that can be created[,]” he also explains that there are several tradeoffs involved in selecting certain drivers in place of others when implementing a system. Ex. 2006, 101:1-5, 104:3-105:10. However, such analysis is absent in his proposed combinations. Indeed, Dr. Almeroth's opinions even regarding drivers were unclear. During depositions, Dr. Almeroth would not provide

¹ Emphasis is added unless otherwise noted.

a clear definition of drivers and software applications, insisting that it is largely dependent on context. Ex. 2006, 24:8-26:17. However, when it suits his argument, Dr. Almeroth clearly identifies a driver as “a term for a special form of software that provides an interface between hardware and application-level software, and is standard in all personal computers.” Ex. 2027, ¶116.

Second, Dr. Almeroth offers inconsistent interpretations of references depending on his hindsight-driven theories of invalidity. Instead of providing a clear and consistent interpretation of a reference as a whole, Dr. Almeroth changes his interpretation to fit the challenged claims. For example, in arguing that a POSITA would combine *Maeda* and *Deforche*, Dr. Almeroth opines:

a POSITA would have been motivated to combine the teachings of Deforche with the system of Maeda because the POSITA would have recognized the combined system provided, at least, a streamlined and more user-friendly application of Maeda’s system—a user is not required to install a separate driver or configure any settings for the peripheral device’s functionality.

Ex. 2026, ¶130.

In other words, Dr. Almeroth alleges a POSITA could improve *Maeda* by avoiding the need to install drivers and implement settings that *Maeda*’s system uses. *Id.* However, this conflicts many other opinions Dr. Almeroth has offered regarding *Maeda*. For example, when asked if *Maeda* describes installation of a driver, Dr.

Almeroth indicated that “I don’t see a reference to a driver. *That might actually be required in the context of other patents and claims*, and so at least for Maeda for the ’237, I don’t recall a limitation where I would have needed to point to support in Maeda for that concept.” Ex. 2008, 33:13-18. When asked if Maeda describes the use of drivers, Dr. Almeroth explained “Paragraph 15 is an example, figure 1, and then it uses that functionality to establish the understanding a person of skill in the art would have had about the use of drivers.” Ex 2006, 78:20-24. He further articulates that:

Pretty much the references to a PC after that and the functionality of a PC communicating with components that are external to the PC via the various interfaces are all the kinds of things that would use drivers. So *I think the concept is taught pretty expansively throughout Maeda. And to be clear, the concept is using PCs to connect to components outside of the device and the interfaces. And they use the drivers to do that.*

Ex. 2006, 79:21-80:3. In other instances, Dr. Almeroth interpreted *Maeda* as not requiring any software. Ex. 2006, 78:1-7 (“I think a person of skill in the art reading this would understand that you have the typical flexibility of how the functionality could be implemented *across the spectrum. Mostly hardware, all hardware, mostly software.*”)

Dr. Almeroth's ambiguous description of references is not limited to *Maeda*. Dr. Almeroth refused to consider the reference for what it reasonably discloses and instead renders all teachings it discloses and does not disclose as design choices to fit the patent challenge. For example, regarding *Kaplan*, when discussing if *Kaplan* requires software installation to function, Dr. Almeroth opined that such software was not necessary. Ex. 2006, 61:6-21 (".... That is not something I rely on as the basis for my opinions in the declaration."). When asked if *Kaplan* disclosed embodiments that did not install software, Dr. Almeroth stated "I don't have *Kaplan* memorized. I don't know if it gives that as an option, ***but it would certainly be an obvious design choice*** just based on the simple way in which computers have operated for at least a decade before the '002 Patent." Ex. 2006, 63:24-64:3. Dr. Almeroth does this with multiple references. Ex. 2009, 21:4-9 ("There is an embodiment within Ono where it does describe storing the connection application, the driver and configuration information on the hard drive. ***But it is not my recollection that that was a limiting aspect of Ono's invention***"); Ex. 2027, ¶136 ("Although Ono's connection application 46, a driver 47 and configuration information 48 are described in one embodiment as stored on a USB memory 45... the location of storage of that information would have been simply ***a matter of design choice.***"). These 'design choices' appear to be based on what specific claim language requires. Ex. 2008, 21:1-5 ("In the context of the '237 patent, I don't think

I've looked – never offered an opinion as to what those required software components are. If I am misremembering some reference to paragraph 48 in the declaration, you can point me to it.”).

Regarding *Uchida*, Dr. Almeroth did not consider teachings to the extent they were not required by the challenged patent. Ex. 2007, 30:22-31:3 (“I have not specifically looked. My recollection is that where the information comes from to set up the wireless network is not a requirement of the claims of the '951 Patent. So how Uchida accomplishes it or how a person of skill in the art would understand that it could be set is not relevant to an aspect of the claim language of the '951 Patent.”) Rather than consider the teachings of references as a whole, independent from the challenged claims, Dr. Almeroth would simply evade questions regarding aspects of the references he did not rely on. Indeed, he indicated he didn't have aspects “memorized” over twenty times and identified over fifteen “design choices” throughout the course of his depositions. *See generally* Ex. 2006; Ex. 2007; Ex. 2008; Ex. 2009. The expansive view Dr. Almeroth takes regarding “design choices” renders his opinions regarding references unreliable and inconsistent.

Based on these examples, among a myriad of others, it is clear that Dr. Almeroth's interpretation of the reference is not actually based on the reference itself, but is instead biased by the patent he is challenging with his opinions and that

the opinions he advances are driven by a desire to reach the claims: classic hindsight. Accordingly, his opinions on at least this topic should be afforded little weight.

III. GROUND 1

Ground 1 fails to render obvious all limitations of each independent claim. Ex. 2004, ¶¶64-95. The Petition provides insufficient motivation to combine *Ono* and *Corbett* as such combination proves unworkable when multiple presenters are involved, as *Ono* is designed to accomplish. The combination also fails to render obvious “an input device... that triggers transfer of said user selected arbitrary media content.” Ex. 1001, Cl. 1; *see also id.*, Cls. 9, 16, 21.

The PTAB found Patent Owner’s argument regarding Ground 1 has merit in its institution decision. Specifically, the Board noted:

Ono describes remote controller 69 as capable of receiving user inputs that will cause a “connection request signal” to be transmitted. Ex. 1005 ¶ 45. Ono also makes clear, however, that the connection request signal does not necessarily result in the transfer of image information because that request may either be accepted or *denied*. *See id.* ¶¶ 82–97. As such in the proposed combination, if the connection request is accepted, then image information is communicated from the transmitter to the wireless communications network and to the base node for display (*id.* ¶¶ 87–88); conversely, if the connection request is not accepted, then image information is not communicated (*id.* at ¶¶ 65–96).

Institution Decision (Paper 12) at 20. As a result, *Ono* fails to teach or suggest the claimed “user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter.”

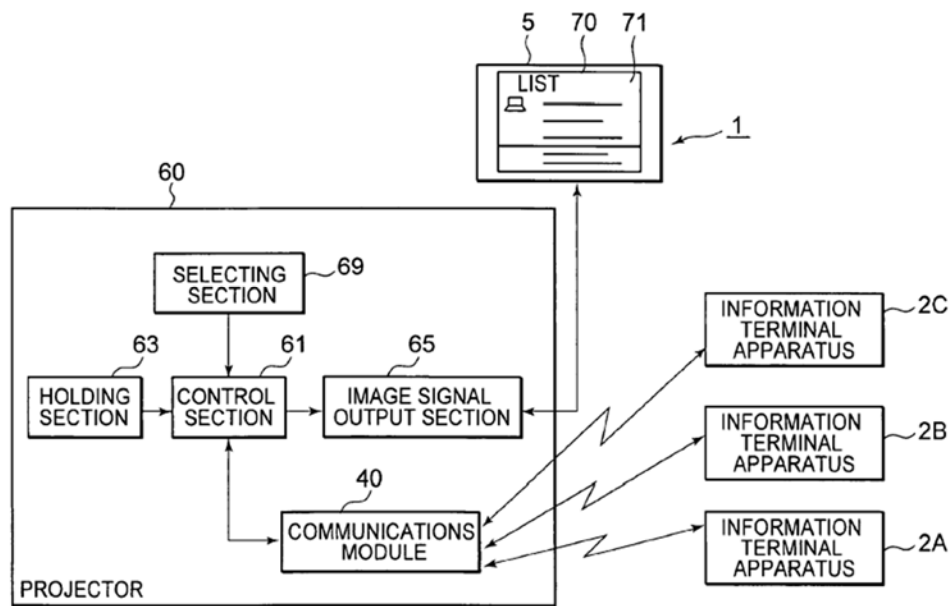
A. *Ono* (Ex. 1005)

U.S. Patent Pub. No. 2005/0210390 (“*Ono*”) is directed to image display systems capable of receiving images from multiple information terminal apparatuses (i.e., PCs) over a network. Ex. 1005, ¶35; Ex. 2004, ¶69. *Ono* recognized that in prior wireless presentation systems “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, ¶6; Ex. 2004, ¶69. *Ono* sought to provide an image display apparatus and image display method capable of switching between a plurality of networked information terminal apparatuses and choosing the desired information terminal apparatus from which to display content. Ex. 1005, ¶7. In other words, *Ono* is directed primarily towards switching between multiple information terminals. *Id.*; Ex. 2004, ¶69.

Ono’s system includes a wireless connection module designed to connect to a slot of a projector. Ex. 1005, ¶39; Ex. 2004, ¶70. The wireless communication module receives images sent from the information terminal apparatuses. Ex. 1005, ¶39. Connection modules are designed to connect to an information terminal apparatus and are used to transmit and receive requests to connect and disconnect

the information terminal apparatuses from the network. Ex. 1005, ¶38. These connection modules are also used to transmit the image information to the projector from the information terminal apparatuses once they are connected. Ex. 1005, ¶¶39, 41; Ex. 2004, ¶70. A block diagram of the image display apparatus 1 including the screen 5, projector 60, communications module 40 and informational terminal apparatuses 2A, 2B, 2C:

FIG. 3



Ex. 1005, ¶42, Fig. 3

The projector 60 includes a selecting section 69 which is used by a user to select which information terminal apparatus from a list that the user would like to display image data from. Ex. 1005, ¶44; Ex. 2004, ¶71. Upon a selection being

made, the control section 61 generates a connection request transmitted to the selected information terminal apparatuses and, if the request is accepted, the information terminal apparatus responds with image data. Ex. 1005, ¶¶45-47; Ex. 2004, ¶71.

B. Corbett (Ex. 1007)

U.S. Patent Pub. No. 2006/0069840 (“*Corbett*”) is directed towards a USB flash drive used to transmit stored data to an external device not compatible with the USB protocol. Ex. 1007, ¶6. The flash drive includes a transmitter capable of transmitting data wirelessly between the flash drive and the external device. Ex. 1007, ¶¶18, 20; Ex. 2004, ¶72. A user initiates the transmission to the external device through a client driver which provides a dialog, menu, displayed button, or another appropriate user interface. Ex. 1007, ¶22; Ex. 2004, ¶73. After initiation, the transmitter on the flash driver transmits data to the external device. Ex. 1007, ¶22; Ex. 2004, ¶73. In another example, data transfer is initiated by the user interacting with a selector (e.g., button, selector wheel) on the flash driver. Ex. 1007, ¶23; Ex. 2004, ¶73.

C. There is No Motivation to Combine Ono with Corbett

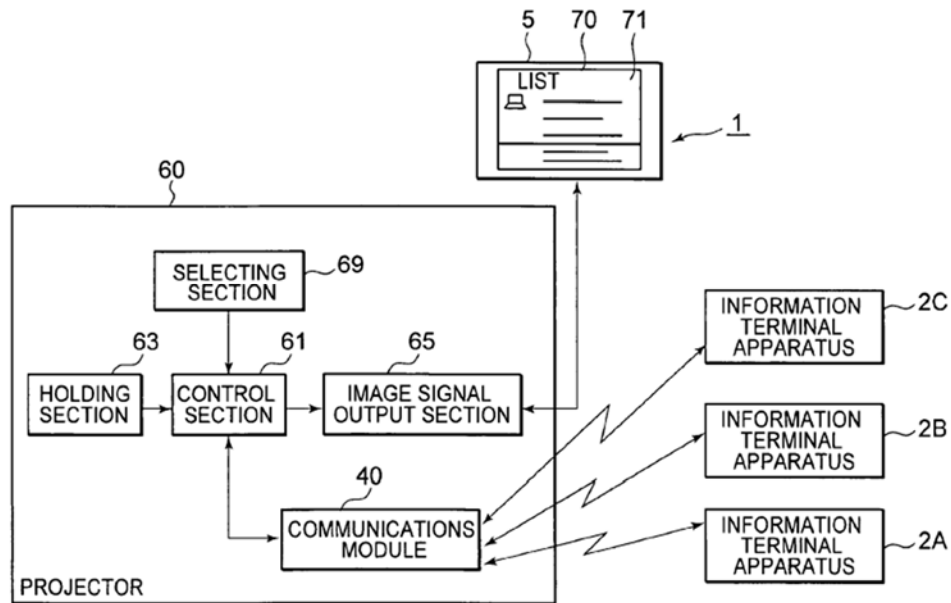
The Petition’s combination proposes “to include [a] input device/physical actuator (providing functionality like Ono’s remote controller) with a peripheral device (like communication module 44)[.]” Petition, 19. The Petition fails to

consider the implications of this combination on the actual operation of the system as described in *Ono*. Ex. 2004, ¶74. Further, the Petition’s arguments are insufficient to establish a POSITA would be motivated to arrive at the *Ono-Corbett* combination. Ex. 2004, ¶74.

1. The *Ono-Corbett* Combination is Unworkable

Ono “seeks to provide an image display system including a plurality of information terminal apparatuses connected to a wire or wireless network and an image display apparatus, wherein switching among the plurality of networked information terminal apparatuses and selecting a desired information terminal apparatus therefrom can be performed from the side of the image display apparatus, and image information from the desired information terminal apparatus can be displayed on a display section of the image display apparatus.” Ex. 1005, ¶8. *Ono* provides a projector 60 that includes a holding section 63, a control section 61, a selecting section 69, an image signal output section 65, and the above-mentioned communications module 40:

FIG. 3



Ex. 1005, Fig. 3, ¶43; Ex. 2004, ¶75.

The holding section 63 stores information about the information terminal apparatuses that connect and communicate over the wireless communication network. Ex. 1005, ¶44; Ex. 2004, ¶76. The selection section selects the information terminal apparatus chosen for display from the list. Ex. 1005, ¶ 44; Ex. 2004, ¶76. Once the information terminal apparatus is selected, the control section generates a connection request for the selected information terminal apparatus, and the connection request is transmitted to that terminal apparatus from the communications module. Ex. 1005, ¶46; Ex. 2004, ¶77. The information terminal then accepts or denies the signal request based on if connection is possible. Ex.

1005, ¶¶47, 94-95; Ex. 2004, ¶78. If the information terminal declines the request, then no image information is transmitted. Ex. 1005, ¶¶47, 96; Ex. 2004, ¶78. If the information terminal accepts the request, the terminal transmits the image information. Ex. 1005, ¶47; Ex. 2004, ¶78. This whole process is dependent on the terminal accepting the request from the communications module.

Ono's remote controller is used to select the information terminal apparatus from the list displayed on the screen. Ex. 1005, ¶66; Ex. 2004, ¶79. The remote controller can be used to configure the wireless network, switch or disconnect information terminal devices, and control displayed content. Ex. 1005, ¶¶66, 68, 70; Ex. 2004, ¶79.

Implementing the functionality of *Ono's* remote control device into each of *Ono's* PC communication modules (as proposed by the Petition) would not result in a predictable or workable solution. Petition, 19; Ex. 2004, ¶80. In the Petition's proposal, each communication module would perform the functions of the selecting section of the projector. Petition, 19; Ex. 2004, ¶81. This would require selecting which information terminal device should share content, as well as controlling the display of the content. Ex. 1005, ¶¶66, 68, 70; Ex. 2004, ¶81. The Petition and Dr. Almeroth provide no articulation of how the projector would navigate multiple competing or conflicting commands from the different communication modules. Ex. Petition, 19-23; Ex. 1002, ¶¶85-100; 2004, ¶81.

Further, the proposed modification ignores the objective of *Ono*: to provide a system where “selecting a desired information terminal apparatus therefrom can be performed *from the side of the image display apparatus*” by forcing the functions of the selector section into the communications module. Ex. 1005, ¶8; Ex. 2004, ¶82. Rather than allow the image display apparatus to provide the selection functionality, which is the primary objective of *Ono*, the Petition proposes eliminating that functionality, which, contrary to Dr. Almeroth’s conclusory opinions that anything “could” be possible, a POSITA would not have been motivated to do. Ex. 2004, ¶82; *see supra* Section II.E (relying on design choice).

Solutions to these issues are also not suggested by *Corbett*. Ex. 2004, ¶83. *Corbett* does not contemplate multiple devices capable of sharing content to the same device (in fact, it’s entirely focused on a single device connecting to a single USB). Ex. 2004, ¶83; *see generally* Ex. 1007. Not only does *Corbett* not describe more than one USB flash device, it does not describe presenting content but instead is just for sharing a generic data signal. *See* Ex. 1007, Abstract; Ex. 2004, ¶83. While Dr. Almeroth believes that any kind of data can be used with any kind of connection in any setting, a POSITA would not find this to be true. Ex. 2006, 101:1-5; Ex. 2004, ¶83.

As the Petition provides not Ground which teaches resolving problems with the purported combination, A POSITA would not be motivated to make the *Ono-Corbett* combination.

2. The Petition's Arguments Regarding Combinability Are Unpersuasive

The Petition proposes modifying *Ono* to include an input device on its connection modules because (1) the combination purportedly arranges know elements with each performing the same function, which yields a predictable result; (2) there was allegedly a “known desirability” to make the modification and (3) the particular placement of the input device allegedly “would have been an obvious matter of design choice[.]” Petition, 19-20. Each of these arguments are inaccurate, conclusory, and made without sufficient legal support. Ex. 2004, ¶84.

First, the input device in *Corbett* does not perform the same function as the input device in the '951 Patent. Ex. 2004, ¶85. The button in *Corbett* does not transfer arbitrary media content to be used for display on a base node. Ex. 1007, ¶23; Ex. 2004, ¶85. In *Corbett*, “[u]pon 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.” Ex. 1007, ¶23. There is no discussion of presenting arbitrary media content, rather than the already defined media content based on what is stored in the flash driver 112. Ex. 2004, ¶85; See

generally Ex. 1007. Likewise, implementing the input devices and control functions of *Ono*'s remote into *Ono*'s PC communication module is not simply the same components performing the same function as explained in Section III.C.1.

Second, to support an apparent “known desirability” the Petition points to *Grimshaw* and *Uchida*. However, Dr. Almeroth’s testimony merely cites to passages of each reference but in no way explain why such implementation is more desirable than the system already used by *Ono*. *See*, Ex. 1002, ¶¶87-91; Ex. 2004, ¶86. Dr. Almeroth completely ignores that *Ono* sought a system “wherein switching among the plurality of networked information terminal apparatuses and selecting a desired information terminal apparatus therefrom can be performed from the side of the *image display apparatus*[.]” Ex. 1005, ¶8; Ex. 2004, ¶86. The Petition fails to explain how there was a “known desirability,” much less explain how this known desirability outweighs the stated goals explained in *Ono*. Ex. 2004, ¶86.

Third, the Petition’s allegation that the modification to *Ono* was a “design choice” is similarly unpersuasive. Dr. Almeroth opines that “[b]uttons and other physical actuators were conventionally located any place reasonably convenient to the user.” Ex. 1002, ¶92. Dr. Almeroth does nothing to establish any design need or market pressure that supports his alleged combination. *Virtek Vision Int’l ULC v. Assembly Guidance Sys., Inc.*, 97 F.4th 882, 888 (Fed. Cir. 2024) (reversing the PTAB where the petition provided “nothing other than an assertion that because two

coordinate systems were disclosed in a prior art reference and were therefore ‘known,’ that satisfies the motivation to combine analysis.”). The Petition’s analysis is at least as thin as that of the Petitioner in *Virtek*. Ex. 2004, ¶87. Moreover, as the Federal Circuit has held, “*KSR* did not do away with the **requirement** that there must exist a motivation to combine various prior art references in order for a skilled artisan to make the claimed invention.” *Id.* The Petition simply does not present such a motivation other than baseless conclusions.

An alteration to *Ono* to move the input device from the remote to the communications unit is not a simple design choice, but instead a hindsight-based decision, amounting to nothing more than selecting exactly what was claimed out of an innumerable list of alternatives that are also “reasonably convenient” to the user. Ex. 2004, ¶88. Accordingly, this argument also fails.

D. The *Ono-Corbett* Combination Does Not Teach Triggering Content Transfer

The ’951 Patent claims “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[.]” Ex. 1001, Cl.1. Similar limitations are included in other claims of the ’951 Patent. Ex. 1001, Cls. 9, 16, 21; Ex. 2004, ¶89. This limitation is not taught by the *Ono-Corbett* combination. *See also*, Institution Decision (Paper 12) at 20.

The Petition relies on *Ono* alone to allege this limitation is obvious. Petition, 31-33. However, *Ono*'s selection section does not “trigger” the transfer of arbitrary media content as claimed. Ex. 2004, ¶90.

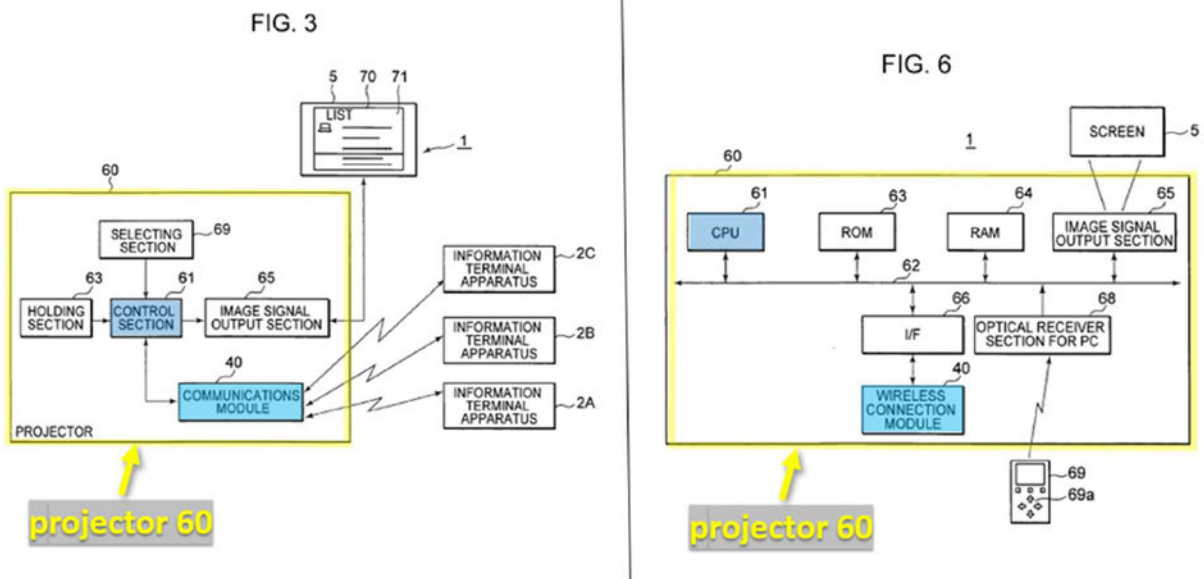
In *Ono*, the control section of the projector generates a connection *request signal*. Ex. 1005, ¶45; Ex. 2004, ¶91. That requires is communicated from the communications module on the projector to the appropriate information terminal apparatus. Ex. 1005, ¶45; Ex. 2004, ¶91. Once the request is sent, the connection request may be either accepted or rejected by the information terminal apparatus. Ex. 1005, ¶¶83, 91; Ex. 2004, ¶91. In other words, the control section does not trigger the transfer of content, it requests the transfer of content, with intervening steps involved until the content is either transferred or not transferred. Ex. 1005, Figs. 9-15; Ex. 2004, ¶91. Merely opening the door for further decision trees, some of which may and some of which may not lead to the transfer of content cannot be said to “trigger” the transmission of anything. Ex. 2004, ¶¶92-93.

The Petition does not posit this limitation is taught by *Corbett*. Petition, 31-33. Accordingly *Ono-Corbett* Combination does not teach this limitation.

E. The *Ono-Corbett* Combination Does Not Teach a Base Node Integrated Into the Display.

Claims 2, 8, 10, 17, and 21 each require at least a base node integrated into the display. Ex. 1001, Cls. 2, 8, 10, 17, 21. The Petition has not presented any

evidence of a base node integrated into a display. As shown by the Petition's own annotations, the alleged base node is part of a **projector** 60, but the projector is not a display:



Petition, 34 (citing Ex. 1005, Figs. 3, 6). Indeed, a projector projects an image onto a screen, like screen 5 in Fig. 6. Ex. 1005, Fig. 6; Ex. 2004, ¶¶94-95.

IV. GROUND 3

Ground 3 fails to render obvious all limitations of each challenged independent claim. Ex. 2004, ¶¶96-117. The Petition provides insufficient motivation to modify *Ichieda*. Further, *Ichieda* does not disclose “triggering transfer of said user selected arbitrary media content[.]” Ex. 1001, Cl. 1; *see also* Ex. 1001, Cls. 9, 16, 21.

The PTAB found Patent Owner’s argument regarding Ground 3 has merit in its institution decision. Specifically, the Board noted:

We find a deficiency with Petitioner’s contention because it lacks a factually supported reason for why a skilled artisan would have modified the third embodiment of *Ichieda* to use information terminal 80 to trigger the transfer of a user selected arbitrary media content associated with PC 90 to the wireless communications network and to projector 50. *Ichieda* teaches that, in the third embodiment, after receiving user inputs from operation section 93, “the control section 91 retrieves the image data to be projected by the projector 50 from the hard disk drive 92, and transmits the image data from the communication section 96 to the projector 50 as the image signal.” Ex. 1006 ¶¶ 133, 139, 150. Petitioner, however, relies on operation section 83 of information terminal 80 to transmit image data from PC 90 without providing any reasoned basis for such a modification.

Institution Decision (Paper 12) at 23. As a result, *Ichieda* fails to teach or suggest the claimed “user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter.”

A. *Ichieda* (Ex. 1006)

U.S. Patent Pub. No. 2008/0074560 (“*Ichieda*”) describes an image display device for displaying information based on multiple different images supply devices over a network. Ex. 1006, Abstract. *Ichieda* describes three discrete embodiments for performing this function. *See generally* Ex. 1006; Ex. 2004, ¶101.

In the relied on third embodiment of *Icheida*, the system relies on a projector, laptop, and information terminal (in *Ichieda*, these are depicted as cellphones). Ex. 1006, ¶¶43, 131; Ex. 2004, ¶102. The projector, like in the other embodiments, includes a number of different “sections” or modules, including a projection section and a control section. Ex. 1006, ¶50; Ex. 2004, ¶102. To connect the PC to the projector, a connection information code is shown on the projector, and the information terminal takes an image of the connection information code and communicates it to the PC. Ex. 1006, ¶135; Ex. 2004, ¶102. The PC then analyzes the connection information code and recognizes the connection information subroutine with a connection establishing program PN. Ex. 1006, ¶¶135, 144; Ex. 2004, ¶102. Once the connection is made, image data can be transmitted directly from the PC to the projector and displayed. Ex. 1006, ¶150; Ex. 2004, ¶102.

Unlike the third embodiment, the first embodiment does not include a PC and therefore is inapplicable to the challenged claims. Ex. 1006, Fig. 1. Instead, it is the information terminals (cellphone) that supply an image to the projector. Ex. 1006, ¶44; Ex. 2004, ¶103. The Second Embodiment is not relied on in the Petition.

B. There Is No Motivation to Modify *Ichieda*

A POSITA would not be motivated to modify *Ichieda*’s Third Embodiment to supply image data from the information terminals as described in *Ichieda*’s First

Embodiment. Further, even if the Petition's alleged 'motivation' is sufficient, a POSITA would not have altered *Ichieda*'s connection process.

The Petition fails to provide an adequate motivation to combine. Instead, the Petition states that "a POSITA would have found it obvious to use such a transmission technique, for example, to free the laptop network card from use." Petition, 71 (citing Ex. 1002, ¶215). The Petition and Dr. Almeroth provide no citation or explanation as to why "freeing the laptop network card from use" would be beneficial or motivate a POSITA to change the transmission process of *Ichieda*. Petition, 71; Ex. 1002, ¶215; Ex. 2004, ¶105. This improperly conclusory allegation is exactly what the Federal Circuit discards when it confirmed that, even post-*KSR*, there still exists a requirement that a motivation must exist to make the proposed changes or modifications to the prior art in an obviousness analysis. *Virtek Vision v. Assembly Guidance*, 97 F.4th at 888.

Further, even if the proposed motivation to modify the Third Embodiment to use the information terminal of the First Embodiment for image transmission was accepted, the Petition provides no motivation for altering the connection process to originate at the information terminal instead of the PC as taught by the Third Embodiment. Ex. 2004, ¶¶104, 106. *Ichieda* is clear that the process to begin transferring image data in the Third Embodiment begins at the PC. Ex. 1006, ¶141; Ex. 2004, ¶107. The control section of the PC (i.e., the CPU) determines whether

the process startup instruction has been received from the operation section (e.g., a keyboard or pointing device). Ex. 1006, ¶¶133, 141; Ex. 2004, ¶107.

When making the proposed combination based on the Petition's (insufficient) motivation for doing so a POSITA would not be motivated to begin this connection process with the information terminal *even if* the information terminal were used "to free the laptop network card from use[.]" Ex. 2004, ¶108. Rather the connection process would still begin at the PC. Ex. 2004, ¶108. The laptop network card is not used to initiate the connection process. Ex. 2004, ¶108. Instead, a connection establishing program PN is run, and the instruction for starting the wireless LAN connection with the projector is transmitted over the transmitter (in the Third Embodiment, the laptop network card; in the Petition's modified embodiment, the information terminal). Ex. 1006, ¶¶139; Ex. 2004, ¶109. Indeed, a POSITA would find it desirable to *centralize* rather than distribute, computing processes, like launching and running the connection establishing program PN in the PC, because PC's have more significant computing power. Ex. 1006, ¶139; Ex. 2004, ¶109. At best, the Petition's modified embodiment of *Ichieda* involves the same connection procedure as the Third Embodiment, with the only difference in performance being the image data from the PC is sent to the projector via the information terminal device. Ex. 2004, ¶109. So, this modified embodiment does not teach the claimed

connection process, even if somehow the First and Third Embodiments of *Icheida* would be combined. Ex. 2004, ¶109.

C. The Alleged Obviousness Theory Does Not Teach Triggering Content Transfer

Like *Ono* in Ground 1, *Ichieda* also does not teach “triggering transfer of said user selected arbitrary media content” Ex. 1001, Cls. 1, 9, 16, 21; Ex. 2004, ¶110.

During the operation of *Ichieda*’s Third Embodiment, the control section of the PC (e.g., the CPU) determines whether the process startup instruction has been received from the operation section (e.g., a keyboard or pointing device). Ex. 1006, ¶¶133, 141; Ex. 2004, ¶111. If so, the PC prompts the user to take an image of the information code displayed on the projector with an information terminal. Ex. 1006, ¶143; Ex. 2004, ¶111. The information code is then communicated from the information terminal to the PC. Ex. 1006, ¶144; Ex. 2004, ¶111. Once the PC receives the information, *Ichieda* performs a subroutine to analyze the information code. Ex. 1006, ¶145; Ex. 2004, ¶112. If the information is recognized, the PC begins setting up the wireless LAN connection on the laptop PC. Ex. 1006, ¶¶146-147; Ex. 2004, ¶112. If the information code is not recognized an error message is displayed on the screen and the information code photograph must be retaken. Ex. 1006, ¶146; Ex. 2004, ¶112. Upon setting up connection, the PC sends a connection request over the LAN to the projector. Ex. 1006, ¶149; Ex. 2004, ¶113. If the PC

determines the project has receives the request, the transmission of image data occurs. Ex. 1006, ¶149; Ex. 2004, ¶114.

In other words, the transmission of the image data from the PC to the projector is not triggered by the user action at all, but instead occurs automatically once the wireless connection is confirmed between the PC and the projector. Ex. 1006, ¶149; Ex. 2004, ¶114. While a user begins the connection process (Ex. 1006, ¶141), there are multiple intervening steps that may prevent the transfer of the image data. Ex. 2004, ¶114. For example, if (1) the information code is not recognized by the PC (Ex. 1006, ¶146); or (2) when the projector rejects the connection response command (Ex. 1006, ¶149) the image data will not be shared. Ex. 2004, ¶114.

These same issues persist in the First Embodiment, even if somehow combinable with the Third Embodiment (which it is not)., Ex. 2004, ¶114. After the process has begun in the First Embodiment, the information terminal must recognize the information code. Ex. 1006, ¶100; Ex. 2004, ¶114. Likewise, the connection response command can still be rejected after the connection has been set up. Ex. 1006, ¶¶87, 89, 103; Ex. 2004, ¶114; *see also* Ex. 1006, Figs. 3, 7.

Accordingly, neither the relied on First Embodiment or Third Embodiment of *Icheida* disclose triggering transfer of image data. Ex. 2204, ¶115.

D. Ichieda Does Not Teach a Base Node Integrated Into the Display.

Claims 2, 8, 10, 17, and 21 each require at least a base node integrated into the display. Ex. 1001, Cls. 2, 8, 10, 17, 21. The Petition has not presented any evidence of a base node integrated into a display. As shown in Fig. 12 below, the *projector* 50, does not include the screen SC:

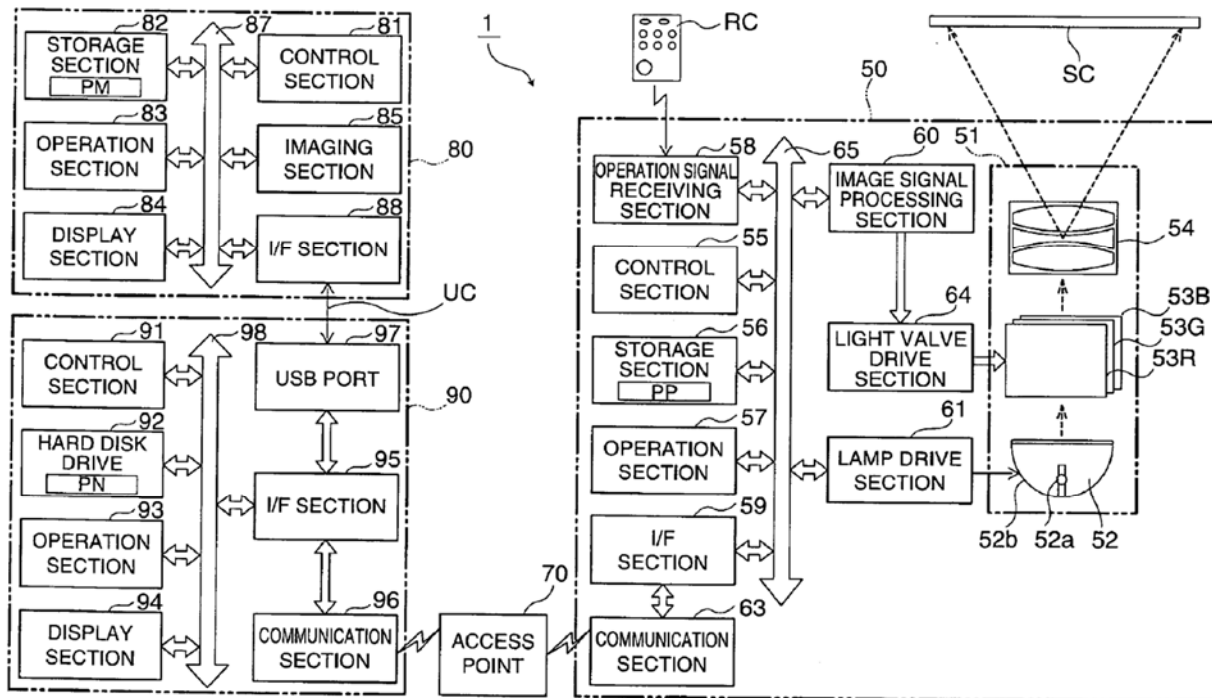


FIG. 12

Ex. 1006, Fig. 12. The projector emits light onto a screen through a liquid crystal display element; the projector is not integrated into the display. Ex. 1006, ¶47; Ex. 2004, ¶¶116-117.

V. GROUND 2

Ground 2 fails to render all elements of the challenged claims obvious. Ex. 2004, ¶¶118-146. Ground 2 relies on a combination of *Uchida* and *Grimshaw*.

However, a POSITA would not be motivated to combine *Uchida* and *Grimshaw* as such combination would render *Uchida* inoperable. Further, the Petition does not establish that *Uchida* or *Grimshaw* render all limitations of the Challenged Claims obvious, including an input device which triggers transfer of user selected arbitrary media content.

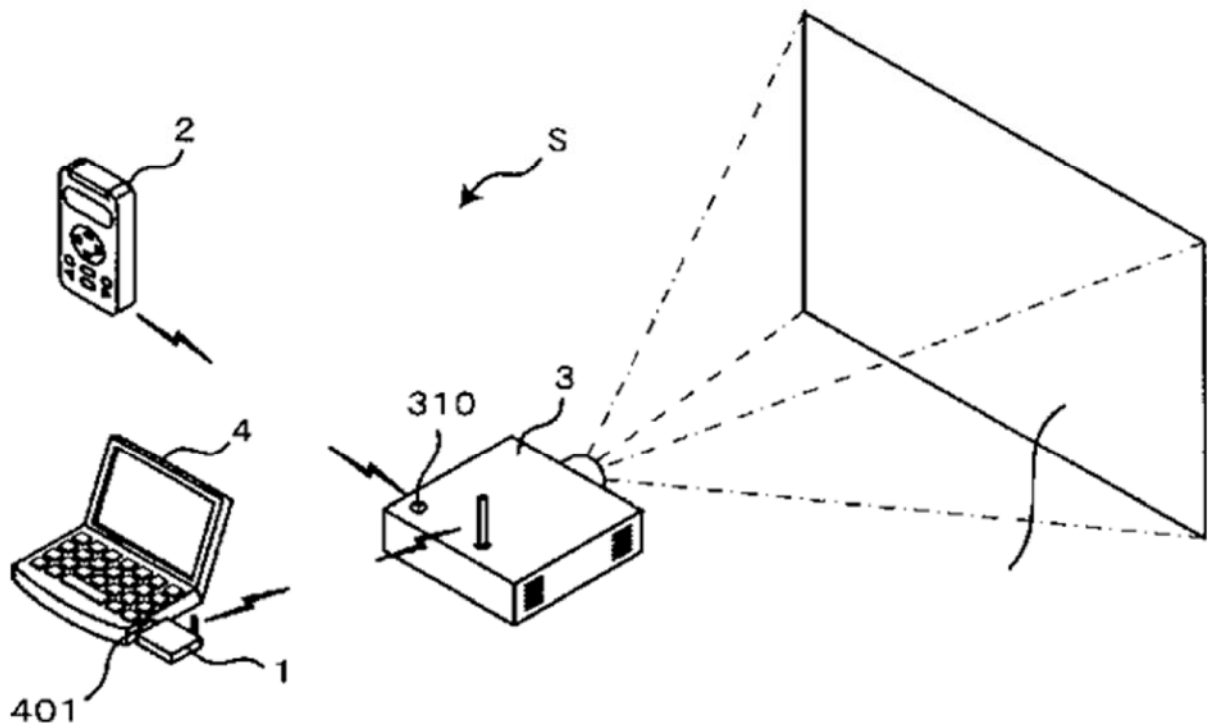
A. *Uchida* (Ex. 1009)

The English translation of Japanese patent application No. 2008-165007 ("*Uchida*") teaches that wireless communication systems risked the scenario where wireless communication setting information could be leaked, thereby compromising the communication link between an image projection device and a computer device. Ex. 1009, ¶12; Ex. 2004, ¶123. This could occur in instances where the image projection device is shared among multiple groups or devices, and the network settings remain on a computer after the system's initial use. Ex. 1009, ¶12; Ex. 2004, ¶123. In these instances, even when wireless communication was performed by one group, an earlier group may continue to communicate the image data, posing a security risk. Ex. 1009, ¶12; Ex. 2004, ¶123.

To solve this issue, *Uchida* provided a remote control device that controls the operation of the image projection device and periodically generates new wireless setting information so previous wireless setting information on earlier-used devices would no longer function. Ex. 1009, ¶13; Ex. 2004, ¶124.

The primary components of the image projection system S include a wireless device 1, a remote control device 2, and an image projection device 3:

[FIG. 1]



Ex. 1009, Fig. 1, ¶39; Ex. 2004, ¶124. The remote control device 2 communicates with the wireless device 1 and controls the operation of the image projection device 3. Ex. 1009, ¶39. The wireless device 1 is a USB dongle that connects to a computer device 4 and has a memory. Ex. 1009, ¶39; Ex. 2004, ¶125.

To transmit to the image projection device, the wireless device must have the correct wireless setting information. Ex. 1009, ¶44. The wireless device receives the wireless setting information when connected to the remote control device via a

USB connector. Ex. 1009, ¶44. The connected remote control device then writes the current wireless setting information to the memory of the wireless device. Ex. 1009, ¶44; Ex. 2004, ¶126.

When the wireless device connects to the computer device, it installs the device driver, wireless setting application, and image transfer application. Ex. 1009, ¶48. The PC then retrieves the wireless setting information from the memory of the wireless device and sets the wireless setting information in the wireless communication unit of the wireless device. Ex. 1009, ¶48. The wireless setting information is also communicated to the image projection device by the remote control device via infrared light or wireless network communications. Ex. 1009, ¶49. With the correct wireless setting information, the wireless device can communicate with the image projection device. Ex. 1009, ¶48; Ex. 2004, ¶127.

To start projecting, the start-up control button 231 on the remote control device is pressed. Ex. 1009, ¶45. It is the start-up control button that shares start and stop instructions to the image projection device, controlling whether the projection device projects information. Ex. 1009, ¶45; Ex. 2004, ¶128. While there is a toggle 140 on the wireless device 1, that toggle switch only tells the projector to project image data or a black screen, and has no impact on whether information is sent from the wireless device 1 to the image projection device. Ex. 1009, ¶71; Ex. 2004, ¶128.

B. Grimshaw (Ex. 1008)

U.S. Patent Pub. No. 2011/0096138 (“*Grimshaw*”) describes a communication system with hardware components that are integrated into a conference room table and other pieces of furniture and provides audio, video, telephony, presentation and other conferencing functions. Ex. 1008, ¶12. A control module 12 acts as an information hub and exchanges information with other hardware components in the system. Ex. 1008, ¶12; Ex. 2004, ¶129. User modules can connect to separate laptop computers and control the different hardware components of the communication system. Ex. 1008, ¶19; Ex. 2004, ¶129. A user can take over at least some control of the communication system by pressing a button on their user module. Ex. 1008, ¶5; Ex. 2004, ¶130. When separate devices are vying for control of the display module, “each of the connecting computers is outputting data signals through data connections 342, 352, 362, 372 for presentation on the display module.... [B]y respectively engaging buttons 344, 354, 364, 374 which causes the switch controller 318 to pass the data signals from the selected user module on the display module. Ex. 1008, ¶19; Ex. 2004, ¶130.

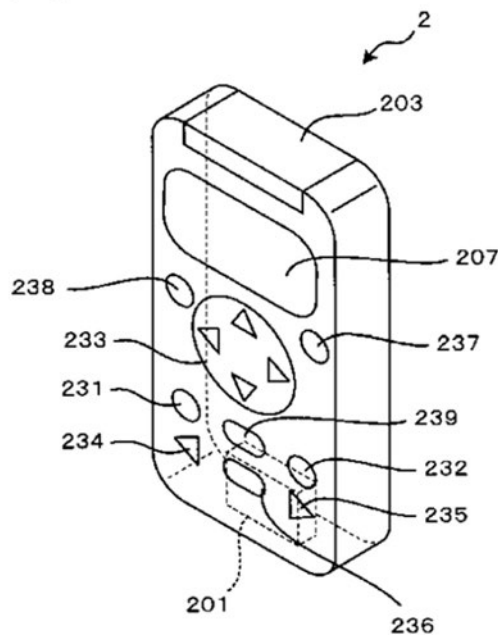
C. The Petition’s Combination Renders *Uchida* Inoperable

The Petition states that “although *Uchida* contemplates multiple computers and wireless devices connected to the image projection device, for example in a conference setting, *Uchida* does not specifically address a scenario where multiple

users are vying for control over the display to project images from their individual computers.” Petition, 46. However, this scenario of users “vying for control” does not exist based on the operation of *Uchida*, nor would a POSITA consider *Uchida* to be applicable to such a situation, due to the pairing teachings of *Uchida*. Ex. 2004, ¶131.

The control functions of the projector in *Uchida* are managed by the remote control:

[FIG. 4]



Ex. 1009, ¶92, Fig. 4; Ex. 2004, ¶132; *see also* Ex. 1009, ¶13 (“the present invention provides ... a remote control device that remotely controls the operation of the image projection device”). The remote includes a number of operation buttons including the start-up control button 231, update button 232, cross key 233, left arrow key 234,

right arrow key 235, enter key 236, information transmission button 237 for transmitting wireless setting information, a hold button 238, and a wireless information setting button 239 for updating the settings. Ex. 1009, ¶92. The remote also includes a display unit 207 which displays settings and assists the user in adjusting the settings as necessary. Ex. 2004, ¶133; *see, e.g.*, Ex. 1009, ¶ 113.

The start-up control button 231 of the remote control device 2 issues start and stop instructions to the image projection device to control its operation. Ex. 1009, ¶45; Ex. 2004, ¶134. The actual control of presentation information is centralized to the remote control device. Ex. 2004, ¶134; *see also* Ex. 1009, ¶13 (“the present invention provides ... a remote control device that remotely controls the operation of the image projection device”).

When transmission from multiple computer devices is desired, the same wireless setting information is shared to the multiple wireless devices before they are connected to the computer devices. Ex. 1009, ¶58. However, there is no issue involving “multiple users vying for control” as the Petition argues. Instead, the same start-up control button 231 on a single remote would be use to start and stop the image projection system, such that there is centralized control. Ex. 1009, ¶45; Ex. 2004, ¶134; *see also* Ex. 1009, ¶13 (“the present invention provides ... a remote control device that remotely controls the operation of the image projection device”). Users cannot vie for control when only one person has control—the person holding

the remote control device. Ex. 1009, ¶45. The problem which allegedly motivates a POSITA to combine the references is fabricated by the Petition and cannot be the basis to modify *Uchida*. Ex. 2004, ¶135

Indeed, this centralization is consistent with *Uchida*'s intention to avoid inadvertent transmission of image data. Ex. 2004, ¶136; *See* Ex. 1009, ¶31 ("Thus, even if an image projection device is used for a conference such as a presentation, and computer devices of an unspecified number of participants are used, it is possible to prevent image data from being mistakenly sent from a computer device that has previously used the image projection device and then sent from the image projection device"). A POSITA would not consider decentralizing the image sharing process, but instead would have maintained this centralized control at the remote control device. Ex. 2004, ¶137. Allowing any other user to override a presenter, as *Grimshaw* is designed to do, would counteract the steps taken by *Uchida* to avoid erroneous image transmission from unintended users. Ex. 1009, ¶¶12-13, 28; Ex. 2004, ¶137. Therefore, there is no motivation to combine *Uchida* and *Grimshaw*. Ex. 2004, ¶137.

D. Dr. Almeroth's Opinions Regarding *Uchida* Should Not Be Given Weight

A prior art reference must be considered in its entirety. *In re Fine*, 837 F.2d 1071, 1075 (Fed. Cir. 1988) ("One cannot use hindsight reconstruction to pick and

choose among isolated disclosures in the prior art to deprecate the claimed invention.”); *W.L. Gore & Assoc., inc. v. Garlock, Inc.*, 721 F.2d 1540 (Fed. Cir. 1983) (“In its consideration of the prior art, however, the district court erred... in considering the references in less than their entirety, i.e., in disregarding disclosures in the references that diverge from and teach away from the invention at hand.”). However, Dr. Almeroth partook in exactly this type of hindsight reconstruction and ignored teachings of the need for wireless setting information with respect to *Uchida*. For example, when asked Dr. Almeroth explained “I have not specifically looked [into the origin for wireless setting information]. My recollection is that where the information comes from to set up the wireless network is not a requirement of the claims of the ’951 patent. So how *Uchida* accomplishes it or how a person of skill in the art would understand that it could be set is not relevant to an aspect of the claim language of the ’951 patent.” Ex. 2007, 30:23-31:3.

Rather than consider the teachings of *Uchida* as a whole, Dr. Almeroth only reviewed the prior art with an eye towards constructing the claimed process, ignoring the other teachings. As Dr. Almeroth failed to consider the entirety of *Uchida* in performing his analysis, his opinions should be given little to no weight.

E. The Uchida-Grimshaw Combination Does Not Teach Triggering Content Transfer

Claim 1 the '951 Patent claims, in part:

(c) *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, Cl. 1. Likewise, Claims 9, 16, and 21 similarly claim triggering the transfer of user selected arbitrary media content. Ex. 1001, Cls. 9, 16, 21. The limitation is not disclosed by the *Uchida-Grimshaw* combination. Ex. 2004, ¶138.

1. *Uchida's* transfer stop switch does not trigger content transfer.

The Petition's reliance on the transfer stop switch is a red herring. The image transfer stop switch is a switch on wireless device 1. Ex. 1009, ¶71; Ex. 2004, ¶139. When the image transfer stop switch is in an on position, the computer is notified of this information. Ex. 1009, ¶71; Ex. 2004, ¶139. Instead of stopping the transfer of image data, the image projection device is instructed to project a specific image ("a black screen image"). Ex. 1009, ¶ 71; Ex. 2004, ¶139. While it inhibits the presentation of data from the laptop, it has no impact on whether data is transmitted

from wireless device 1 to projector 3. Ex. 1009, ¶ 71; Ex. 2004, ¶140. The transfer stop switch is a safety, not a trigger. Ex. 2004, ¶140.

Even if the image transfer stop switch stops all signal transfer from the wireless device, there is no evidence in *Uchida* that the image display would automatically resume when the signal transfer stop switch is turned off. Ex. 2004, ¶141. The Petition’s interpretation is not based on any teaching from *Uchida* itself but a hindsight driven interpretation to read claim limitations into the prior art. Indeed, *Uchida*’s transfer stop switch primary purpose is to *avoid* unwanted image transfer. Ex. 1009, ¶12; Ex. 2004, ¶141 *see also* Ex. 1009, at ¶31 (“Thus, even if an image projection device is used for a conference such as a presentation, and computer devices of an unspecified number of participants are used, it is possible to prevent image data from being mistakenly sent from a computer device that has previously used the image projection device and then sent from the image projection device”). The start and stop instructions that originate from the remote control are the *only* identified means to begin, or trigger, image projection in *Uchida*. Ex. 1009, ¶45; Ex. 2004, ¶141.

2. *Grimshaw* does not teach the input device

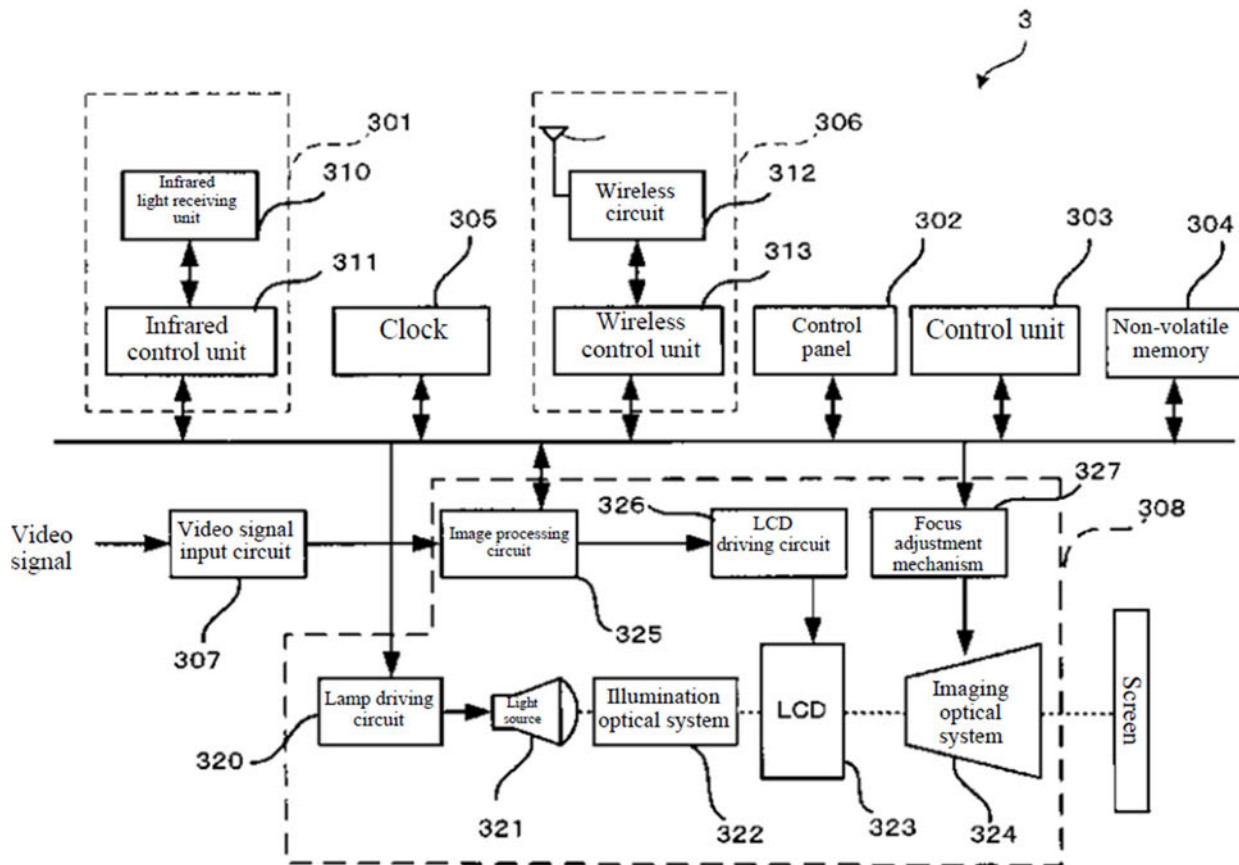
The Petition also alleges that the input device is obvious in light of *Grimshaw*’s user module buttons. Petition, 58-59. However, the module buttons in

Grimshaw also do not “trigger transfer of user selected arbitrary media content[.]” Ex. 1001, Cl. 1; *see also*, Cl. 9, 16, 21; Ex. 2004, ¶142.

In *Grimshaw* a switch controller 318 receives audio, video, and data signals from the ***all*** user modules and communications accessories based on user selections. Ex. 1008, ¶19; Ex. 2004, ¶143. When separate devices are vying for control of the display module, “each of the connecting computers is outputting data signals through data connections 342, 352, 362, 372 for presentation on the display module.... [B]y respectively engaging buttons 344, 354, 364, 374 which causes the switch controller 318 to pass the data signals from the selected user module on the display module. Ex. 1008, ¶19; Ex. 2004, ¶143. In other words, the buttons do not *trigger* data transfer from the transmitter, they merely instruct the switch controller which data signal should be routed to the display. Ex. 2004, ¶143. The data arrives at the switch control regardless of whether the button has been pressed or not (assuming there is a connection to the computer). *Id.*, ¶144.

F. The *Uchida-Grimshaw* Combination Does Not Teach a Base Node Integrated Into the Display.

Claims 2, 8, 10, 17, and 21 each require at least a base node integrated into the display. Ex. 1001, Cls. 2, 8, 10, 17, 21. The Petition has not presented any evidence of a base node integrated into a display. As shown in Fig. 14 below, the ***projector unit*** 308, does not include the screen:



Ex. 1009, Fig. 14. The projector emits light onto a screen through a liquid crystal display element; the projector is not integrated into the display. Ex. 1009, ¶2; Ex. 2004, ¶¶145-146.

VI. EVIDENCE ESTABLISHES NON-OBVIOUSNESS OF THE INVENTION

A determination of obviousness requires determination of (1) the scope and content of the prior art; (2) the difference between the claims and the prior art; (3) the level of ordinary skill in the art; and (4) the presence of evidence of secondary considerations. *See Graham v. John Deer Co. of Kan. City*, 383 U.S. 1, 17-18 (1966). These secondary considerations include commercial success, industry

praise, unexpected results, copying, industry skepticism, licensing, and long-felt but unsolved need. *Transocean Offshore Deepwater Drilling, Inc. v. Maersk Drilling USA, Inc.*, 699 F.3d 1340, 1349 (Fed. Cir. 2012). When evidence of secondary considerations is present, it must be considered by the Board. *Nike, Inc. v. Adidas AG*, 812 F.3d 1326, 1340 (Fed. Cir. 2016) (“We must therefore remand for the Board to examine Nike’s evidence and its impact, if any, on the Board’s analysis under the first three *Graham* factors.”). Patent Owners must show a sufficient nexus between the objective evidence and the claimed invention, but objective evidence “need only be reasonably commensurate with the scope of the claims[.]” *Rambus Inc. v. Rea*, 731 F.3d 1248, 1256, 1257 (Fed. Cir. 2013) (internal quotation marks and citation omitted). A nexus is presumed when “the patentee shows that the asserted objective evidence is tied to a specific product and that product ‘embodies the complained features, and is coextensive with them.’” *Polaris Indus. V. Arctic Cat, Inc.*, 882 F.3d 1056, 1072 (Fed. Cir. 2018) (citing *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.*, 229 F.3d 1120, 1130 (Fed. Cir. 2000)). Here, the proffered secondary considerations are based on both Barco’s patent practicing product as well as its competitors’ licensing activities.

“Licenses to the challenged patent then, unlike products or other forms of objective evidence of nonobviousness, do not require a nexus with respect to the specific claims at issue, nor does our nexus law require that a particular patent be the

only patent being licensed or the sole motivation for entering into a license.” *Ancora Techs., Inc. v. Roku, Inc.*, No. 2023-1674, 2025 WL 1679967, at *7 (Fed. Cir. June 16, 2025). Moreover, “the fact that a license concerns rights to more than one patent does not detract from the fact that each patent is a subject of the license.” *Id.* at *8. Where “other patents may have also been part of the license [it] does not detract from the nexus inquiry. These licenses, taken by substantial parties paying substantial royalties to secure the right to practice the [challenged] patent, should have been given more, *if not controlling*, weight in the Board's obviousness determination” *Id.* at *9.

A. The Barco System Embodies the Claimed Invention of the '951 Patent.

Patent Owner need not show “a perfect correspondence” between the claim invention and the commercial product. *Fox Factory Inc., v. SRAM LLC*, 944 F.3d 1366, 1374 (Fed. Cir. 2019). Instead, the Patent Owner must show that the product is essentially the claimed invention. *Id.*, (citing *Demarco Corp., v. F. Von Langsdorff Licensing, Ltd.*, 851 F.2d 1387, 1392 (Fed. Cir. 1988)). Patent Owner provides a system for wireless presentation, which embodies claims of the '951 Patent. Ex. 2013. Patent Owner identifies the '951 Patent as practiced by the ClickShare Products on its website. Ex. 2017, 9. The Clickshare line involves the ClickShare Button (“ClickShare Button”) and a number of components capable of

receiving communications from the ClickShare including the C-5, C-10, CX-20, CX-30, CX-50, CX-50 Gen2, CB Core, and CB Pro (“Barco Bases”). Together, ClickShare Button and a Barco Base form the Barco System.

The ClickShare marketing materials illustrate that the Barco System is essentially the claimed invention. *See generally* Ex. 2013; Ex. 2014. The features and benefits the ’951 Patent’s claims provide are evident in the Barco System. For example, “[s]tart wireless presentation and conferencing in less than 7 seconds.” Ex. 2014, 3. Likewise, the ClickShare “connects your laptop to the audio and video equipment of your conference room,” as noted in each independent claim of the ’951 Patent. Ex. 1001, Cl. 21 (“communicating arbitrary media content”); Ex. 2013, 1; *see also* Ex. 1001, Cls. 1, 9, 16, 21. The relationship between the claims of the ’951 Patent and the Barco System are clear. *See Demarco*, 851 F.2d at 1394 (“A requirement for proof of the negative of all imaginable contributing factors would be unfairly burdensome.”). As is clear from the images of the products below, there is essentially no unclaimed feature in the accused products.

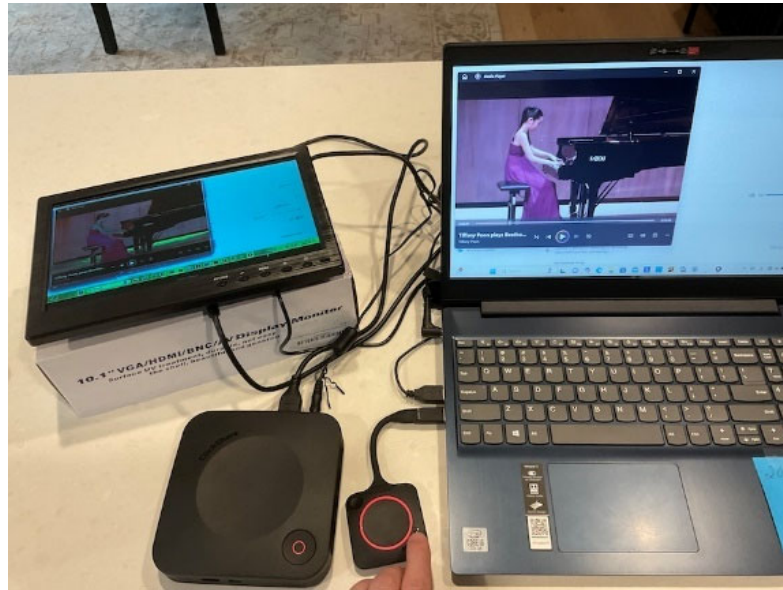
The Barco System practices at least claims 1, 3-7, 9, 11, 13-14, 16, 18-20 of the ’951 Patent. Ex. 2004, ¶¶147-193

1. Claim 1

- a. An electronic meeting tool for communicating user selected arbitrary media content from users at a meeting comprising:

The Barco System provides a meeting tool for communicating user selected arbitrary media content from users at a meeting as set for in claim 1. Ex. 2004, ¶148.

For example, ClickShare Button connects the processing device (e.g., a laptop computer) to a communications network to share media content as shown below:

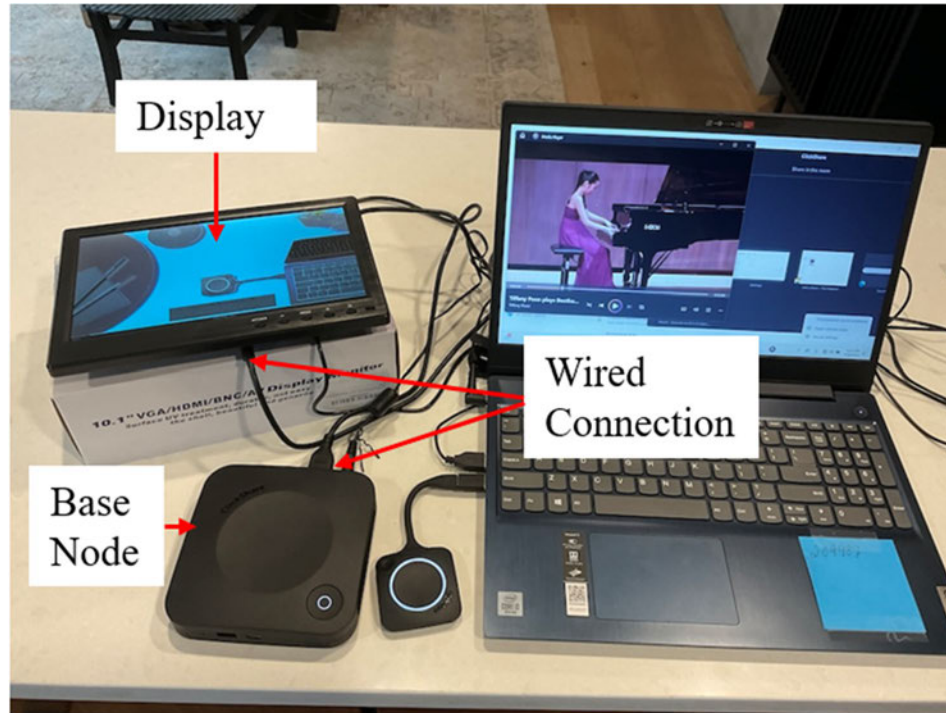


Ex. 2004, ¶149.

- b. a base node, the base node being coupled to a first display, the base node being adapted to receive user selected arbitrary media content from at least one peripheral device via a wireless communications network, and to control display of the user selected arbitrary media content on the first display; and

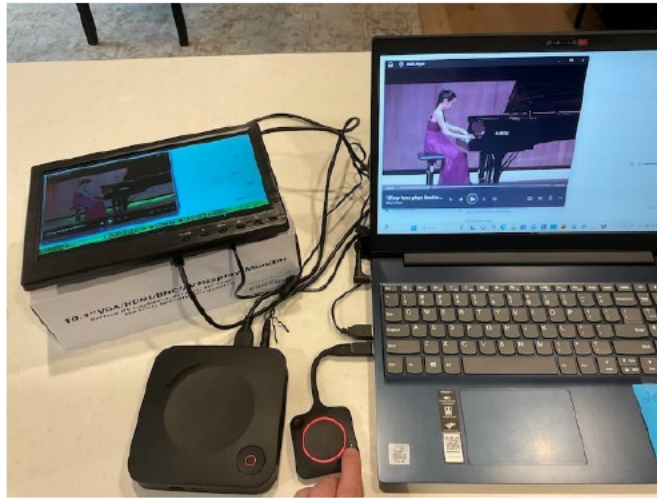
The Barco System provides a base node, the base node capable of being coupled to a display and adapted to receive user selected arbitrary media content from at least one peripheral device via a wireless communication network, and control display of the user selected arbitrary media content on the first display. Ex.

2004, ¶150. ClickShare Base may be coupled to a display through a wired connection:



Ex. 2004, ¶151.

ClickShare Base is also adapted to receive user selected media content over the wireless network and control display of the user selected media content on the first display as evidenced by the same screen scraped data depicted on the display as on the laptop:



Ex. 2004, ¶152.

- c. the at least one peripheral device being adapted to communicate the user selected arbitrary media content to the wireless communications network;

The Barco System includes at least one peripheral device being adapted to communicate the user selected arbitrary media content to the wireless communications network. Ex. 2004, ¶153. For example, ClickShare Button provides network connectivity through a wireless transmission protocol:

General specifications

Connectors	USB-C type
Authentication protocol	WPA2-PSK in stand alone mode WPA2-PSK or IEEE 802.1X in network integration mode
Wireless transmission protocol	IEEE 802.11 a/b/g/n/ac
Frequency band	2.4 GHZ and 5 GHz

Ex. 2014; Ex. 2024, ¶154.

- d. wherein the at least one peripheral device is a connection unit comprising:

The Barco System includes a connection unit, ClickShare Button, which includes the limitations explained in Sections VI.A.1.e-VI.A.1.g. Ex. 2004, ¶156.

- e. (a) a connector adapted to couple to a port of a user processing device, the user processing device having a second display and a memory,

ClickShare Button includes a connector adapted to couple to a port of a user processing device, the user processing device having a second display and a memory. Ex. 2004, ¶157. ClickShare Button is coupled to the laptop computer as shown below:



Ex. 2004, ¶158.

A laptop computer is a user processing device includes a memory and display.

Ex. 2004, ¶158.

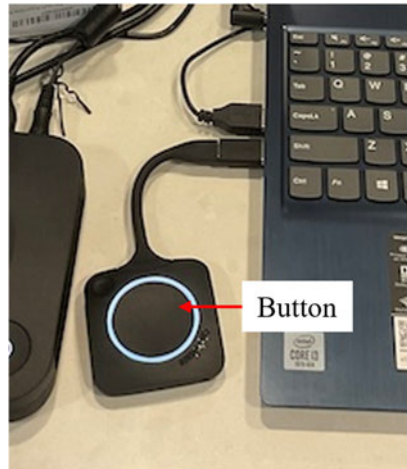
- f. (b) a transmitter for transferring user selected arbitrary media content to the wireless communications network, and

The ClickShare Button includes a transmitter for transferring user selected arbitrary media content to the wireless communications network as explained in Section VI.A.1.c. Ex. 2004, ¶¶159-160.

- g. (c) 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

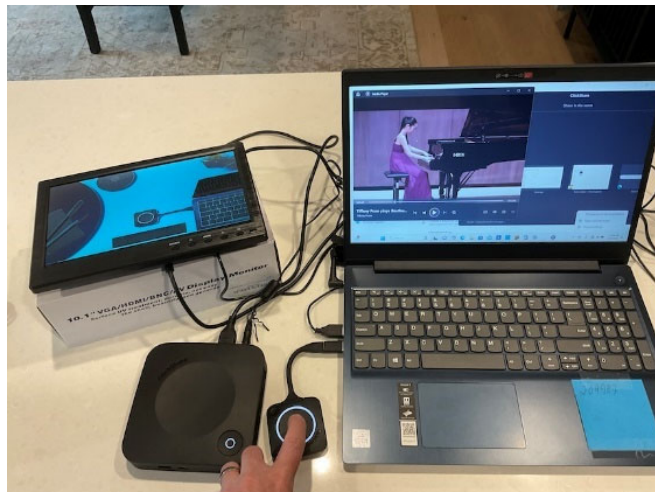
The ClickShare Button includes an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and to the base node through the wireless communications network for display on the first display, the input device being a physical actuator coupled to the at least one peripheral device. Ex. 2004, ¶161.

ClickShare Button's input device configured to allow the user to carry out a user action is depicted below:

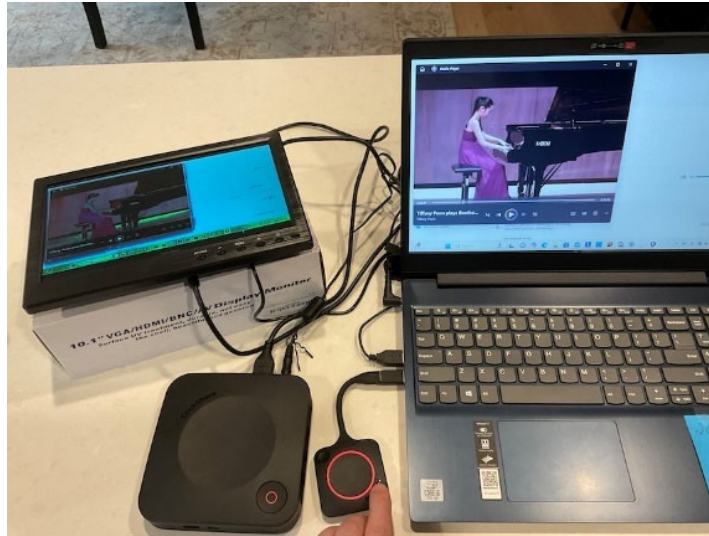


Ex. 2004, ¶162. The input device is a physical actuator coupled to ClickShare Button. Ex. 2004, ¶163.

The input device of ClickShare Button also triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communication network and to the base node through the wireless communications network for display on the first display. Ex. 2004, ¶163. For example, prior to pressing the input device on ClickShare Button, media content is not shared from the processing device:



Ex. 2004, ¶164. Once the input device is pressed, content is shared from the laptop computer, via the ClickShare Button and Barco Base to the display:



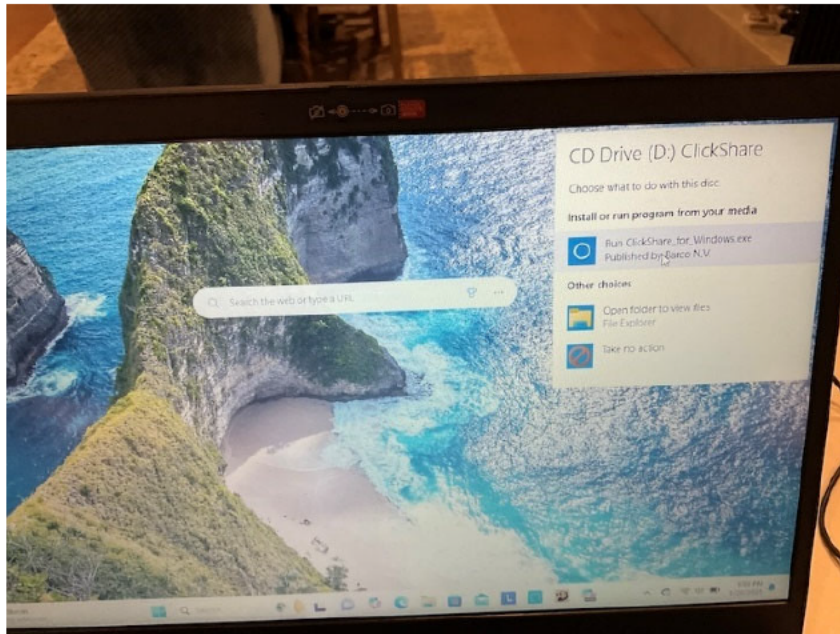
Ex. 2004, ¶165. The data is transferred through this means because, when content is shared the laptop computer is not connected to any external networks. Ex. 2004, ¶166.

2. Claim 3

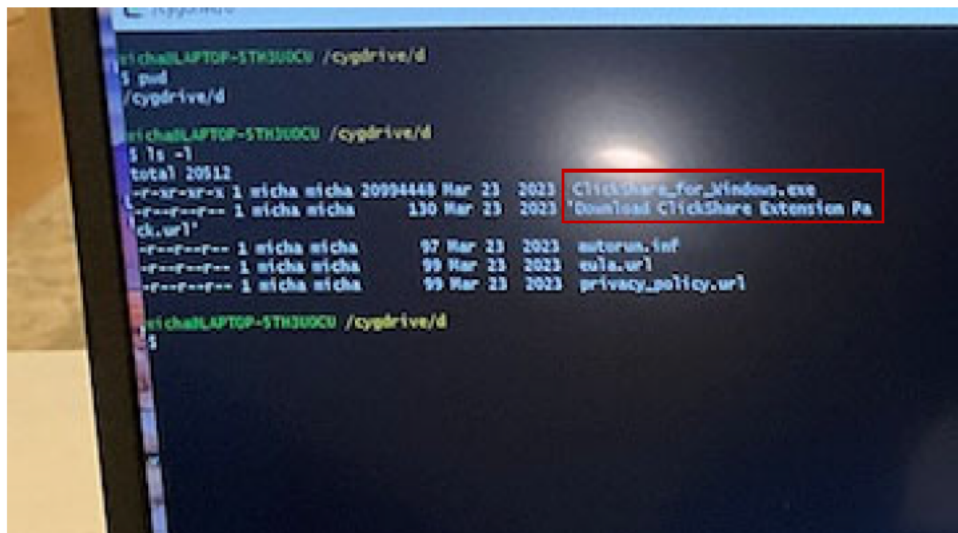
- a. The electronic meeting tool according to claim 1, further comprising a program adapted to be loaded onto the user processing device and to run on an operating system of the user processing device, said program being adapted to obtain said user selected arbitrary media content from the user processing device.

The Barco System includes a program adapted to be loaded onto the user processing device and to run on an operating system of the user processing device, said program being adapted to obtain said user selected arbitrary media content from

the user processing device. Ex. 2004, ¶167. For example, when ClickShare Button is connected to the laptop computer, an executable file is available:

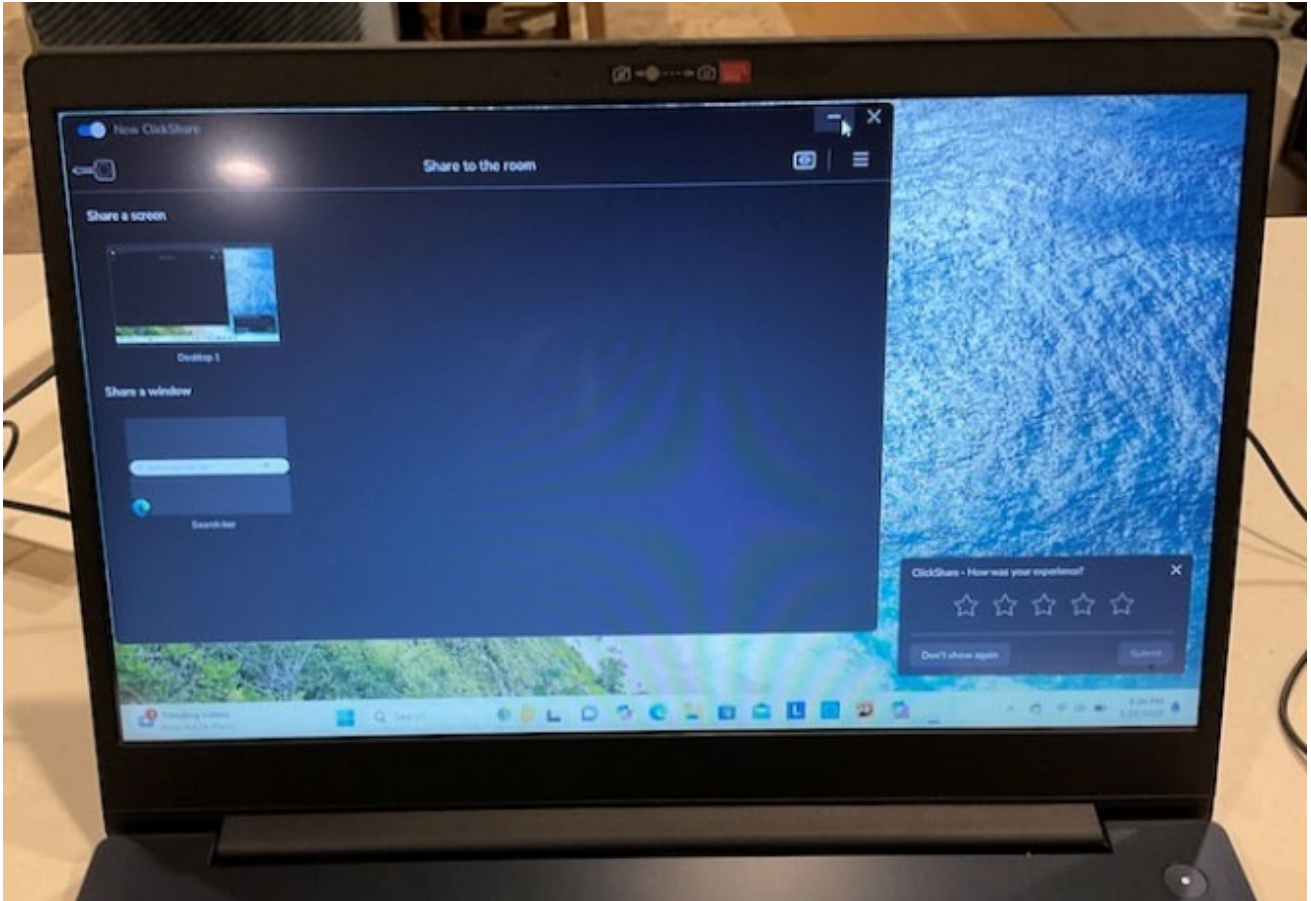


Ex. 2004, ¶168.



Ex. 2004, ¶168.

Additionally, this executable file, when run, obtains screen scraped data that can be communicated to a base node:



Ex. 2004, ¶169.

3. Claim 4

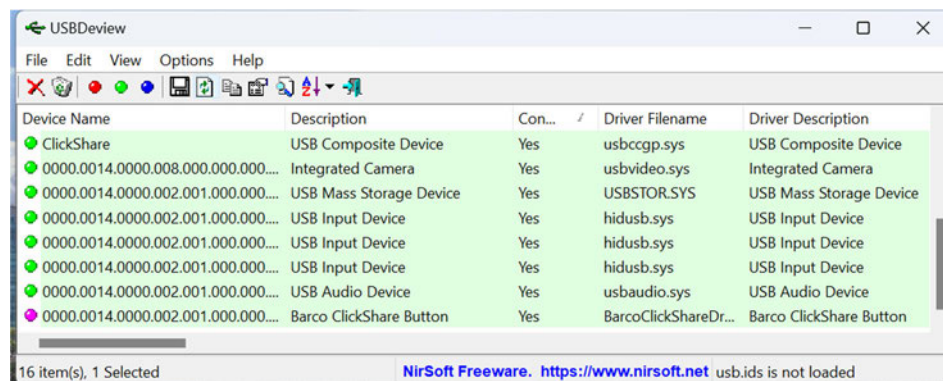
- a. The electronic meeting tool of claim 1, wherein the at least one peripheral device is a plug-and-play device.

ClickShare Button is a plug-and-play device. For example, ClickShare Button includes a USB connector which is an example of a plug-and-play port described in the '951 Patent. Ex. 1001, 9:66-10:4. Ex. 2004, ¶¶170-171.

4. Claim 5

- a. The electronic meeting tool of claim 1, wherein the electronic meeting tool is configured to present the at least one peripheral device to the user processing device as a human interface device via a pre-installed generic driver which is a human interface device driver, or to present the at least one peripheral device to the user processing device as a mass storage device via a pre-installed generic driver which is a mass storage device drive, or to present the at least one peripheral device to the user processing device as a composite device via pre-installed generic drivers which drive different device interfaces independently.

ClickShare Button presents to the user processing device as a human interface device, a mass storage device, and a composite device. Ex. 2004, ¶172. As shown below, the USBDevview tool shows the ClickShare button as presenting as a composite device, mass storage device, and human interface device:



Ex. 2004, ¶¶173-174

Each of these devices use pre-installed generic drivers (e.g., hidusb.sys, usbccgp.sys, usbstor.sys) which may be used to drive the peripheral device. Ex. 2004, ¶175.

5. Claim 6

- a. The electronic meeting tool according to claim 1, wherein at least one channel is formed between the transmitter of the at least one peripheral device over the wireless communications network to the base node that is independent from the networking capability of the user processing device.

The Barco System include at least one channel formed between the transmitter of the at least one peripheral device over the wireless communications network to the base node that is independent from the network capability of the user processing device. Ex. 2004, ¶176. For example, the image transmission shown in Section VI.A.1.b can be performed when the laptop computer is disconnected from any networks. Ex. 2004, ¶176.

6. Claim 7

- a. The electronic meeting tool according to claim 1, wherein the at least one peripheral device is configured to encode, compress, and/or encrypt the user selected arbitrary media content when transmitting the user selected arbitrary media content from the transmitter to the base node of the wireless communications network.

The ClickShare Button is also configured to encode, compress, and/or encrypt the user selected arbitrary media content when transmitting the user selected arbitrary media content from the transmitter to the base node of the wireless communications network. Ex. 2004, ¶177. For example, ClickShare Button complies with the WPA2-PSK protocol, which is a widely used WiFi Security Protocol:

General specifications

Connectors	USB-C type
Authentication protocol	WPA2-PSK in stand alone mode WPA2-PSK or IEEE 802.1X in network integration mode
Wireless transmission protocol	IEEE 802.11 a/b/g/n/ac
Frequency band	2.4 GHZ and 5 GHz

Ex. 2012; 2004, ¶178.

7. Claim 9

- a. An electronic meeting tool for communicating user selected arbitrary media content from users at a meeting comprising:

This limitation is practiced for the Barco System as shown *supra* Section

VI.A.1.a. Ex. 2004, ¶179

- b. a base node, the base node being coupled to a first display, the base node being adapted to receive user selected arbitrary media content from at least one peripheral device via a wireless communications

network, and to control display of the user selected arbitrary media content on the first display; and

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.b. Ex. 2004, ¶179

- c. the at least one peripheral device being adapted to communicate the user selected arbitrary media content to the wireless communications network;

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.c. Ex. 2004, ¶179

- d. wherein the at least one peripheral device is a connection unit comprising:

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.d. Ex. 2004, ¶179

- e. (a) a connector adapted to couple to a port of a user processing device, the user processing device having a second display and a memory, and

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.e. Ex. 2004, ¶179

- f. (b) a transmitter for transferring said user selected arbitrary media content to the wireless communications network; and

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.f. Ex. 2004, ¶179

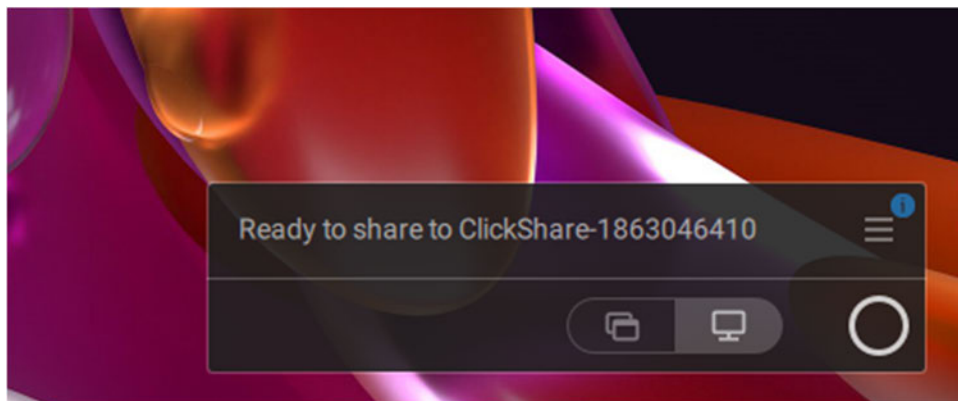
- g. an input device configured to allow the user to carry out a user action on the input device that triggers transfer of said user selected arbitrary media content from the transmitter to the wireless communications network and via the wireless communications network to the base node for display on the first display.

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.g. Ex. 2004, ¶179

8. Claim 11

- a. The electronic meeting tool according to claim 9, wherein the input device is displayed on the second display.

The input device of the Barco System is displayed on the second display. Ex. 2004, ¶180. For example, in addition to being presented on the ClickShare Button, the input device is shown in the screen in the image below:

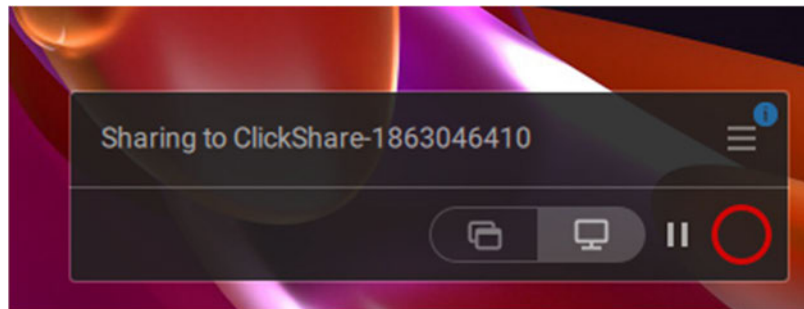


Ex. 2004, ¶181.

9. Claim 13

- a. The electronic meeting tool according to claim 9, wherein the input device is on a keyboard connected to the user processing device, is displayed on the second display and is able to be activated with a mouse pointer connected to the user processing device, or is displayed on the second display which is a touch screen and is able to be activated by the user action of touching the input device.

The Barco System includes an input device on the second display which is able to be activated by the mouse pointer. Ex. 2004, ¶182. For example, when a user activates the input device shown in Section VI.A.9, the input device turns red to illustrate that arbitrary media content is being shared to the first display:



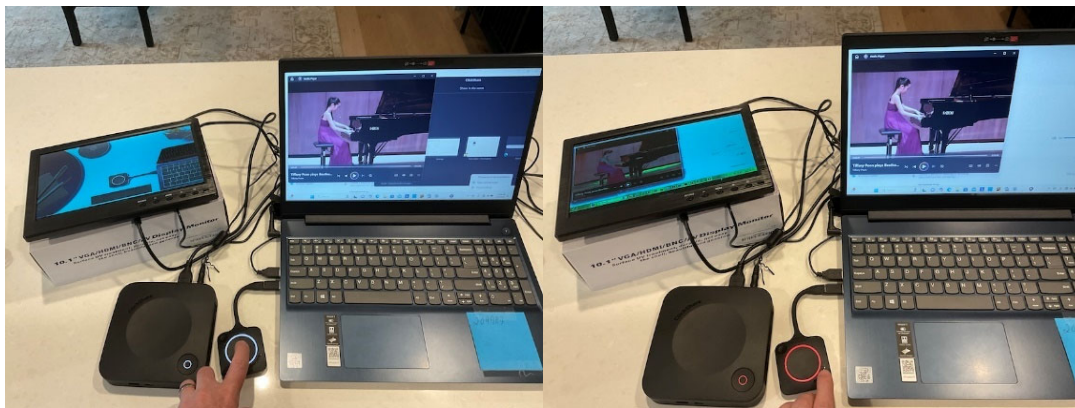
Ex. 2004, ¶183.

10. Claim 14

- a. The electronic meeting tool according to claim 9, wherein the at least one peripheral device further comprises an optical indicator for providing a visual indication of changes in state of the at least one peripheral device including when the user selected

arbitrary media content is being transmitted by the at least one peripheral device.

The ClickShare Button includes an optical indicator for providing a visual indication of changes in state of the at least one peripheral device including when the user selected arbitrary media content is being transmitted by the at least one peripheral device as shown in the side-by-side images below:



Ex. 2004, ¶¶184-185.

11. Claim 16

- a. A method for communicating arbitrary media content from users at a meeting comprising:

This limitation is practiced for the Barco System as shown *supra* Section

VI.A.1.a. Ex. 2004, ¶186.

- b. operating a first display, wherein the first display is coupled to a base node, the base node being adapted to receive user selected arbitrary media content from a peripheral device via a wireless communications network and to control display of the user selected arbitrary media content on the first display;

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.b. Ex. 2004, ¶186.

- c. connecting the peripheral device to a port of a user processing device and communicating the user selected arbitrary media content to the wireless communications network; and

This limitation is practiced for the Barco System as shown *supra* Sections **Error! Reference source not found.**-VI.A.1.f. Ex. 2004, ¶186.

- d. 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.

This limitation is practiced for the Barco System as shown *supra* Section VI.A.1.g. Ex. 2004, ¶186.

12. Claim 18

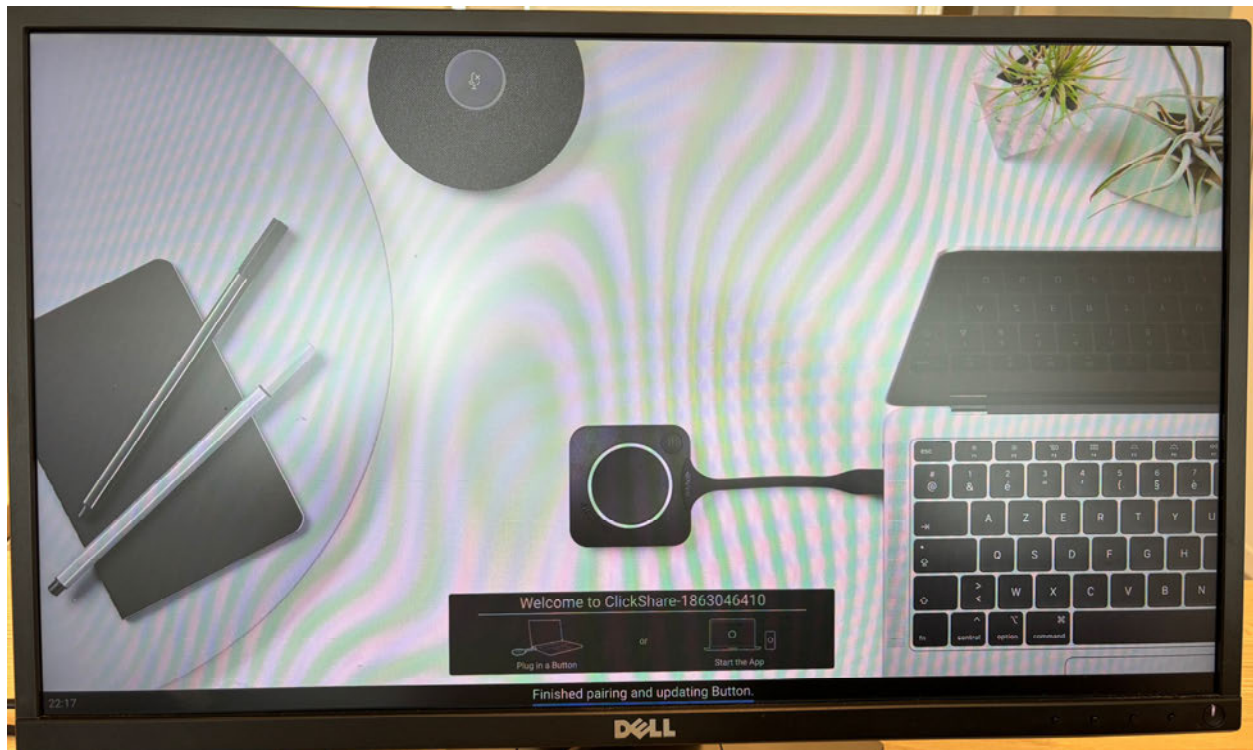
- a. The method of claim 16, further comprising the step of loading a program onto the user processing device and running the program on the operating system of the user processing device to obtain user selected arbitrary media content.

This limitation is practiced for the Barco System as shown *supra* Section VI.A.3.a. Ex. 2024, ¶187.

13. Claim 19

- a. The method of claim 16, further comprising configuring the peripheral device to connect to the wireless communications network by pairing the peripheral device with the base node.

ClickShare Button can be paired to a Barco Base. Ex. 2004, ¶188. For example, a user can pair a ClickShare Button to a Barco Base by plugging the ClickShare Button into the USB-C port of the Barco Base. Ex. 2004, ¶189. Once the pairing has been completed, the first display coupled to the Barco Base indicates that pairing has been completed:

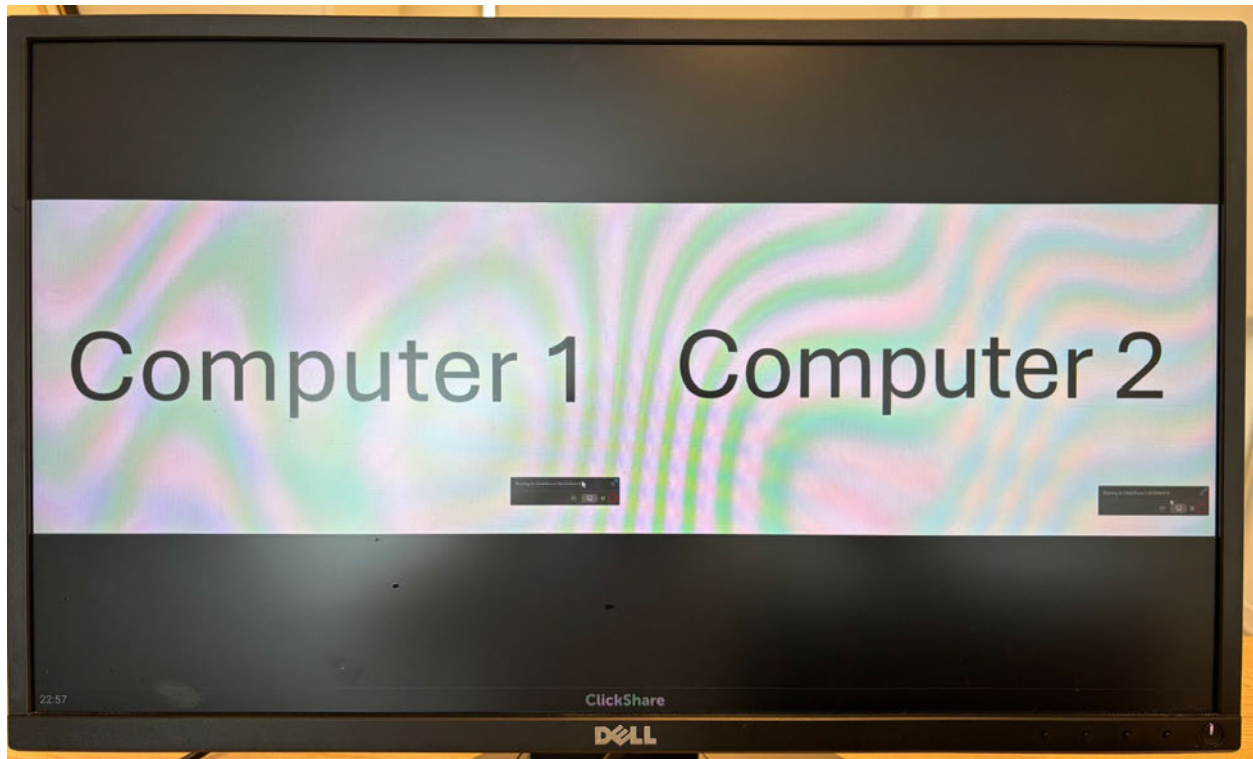


Ex. 2004, ¶189.

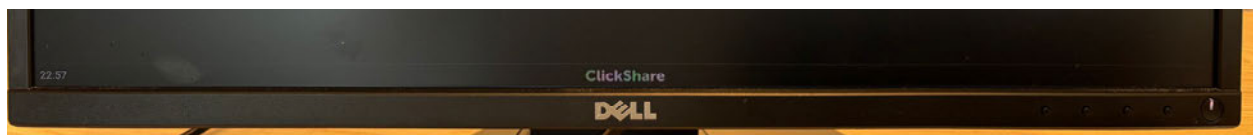
14. Claim 20

- a. The method of claim 16, further comprising displaying user selected arbitrary media content on the first display in accordance with a set of rules.

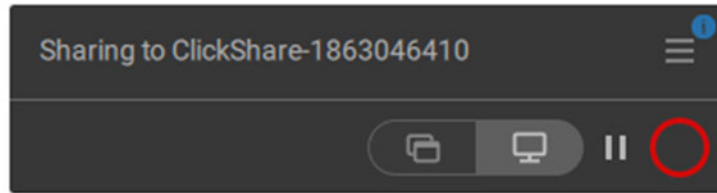
The Barco System displays user selected arbitrary media content on the first display based on a set of rules. Ex. 2004, ¶190. For example, the image below shows simultaneous display of two laptop computer screens on the first display:



Ex. 2004, ¶191. Use of the Barco System is evidenced by the “ClickShare” label on the bottom of the display shown in more detail in in the image below:



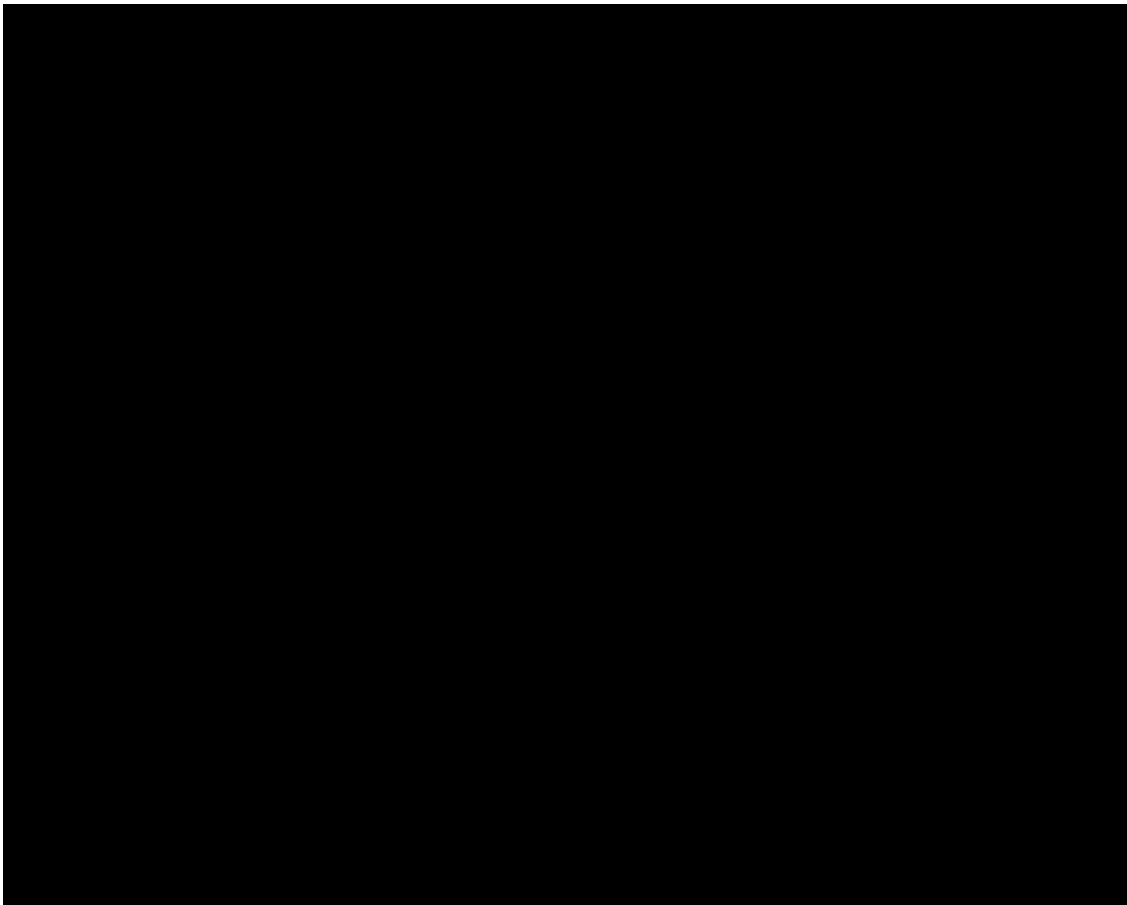
and the portable application GUI shown on each shared screen depicted in more detail in the image below:



Ex. 2004, ¶¶192-193.

B. The Barco System Has Achieved Significant Commercial Success

The commercial success of the Barco Practicing System is demonstrated by the United States Net Sales Annual Totals for the ClickShare product line:



[REDACTED]

Ex. 2010.

Over this period, Patent Owner has [REDACTED] in revenue and [REDACTED] in profit in the United States from its commercialization of the invention claimed in the '951 Patent. Ex. 2010. Patent Owner's commercial success using its patented invention is strong evidence that the claims of the '951 Patent are nonobvious.

C. Acquiescence of Market Competitors

Crestron is a licensee of the '951 Patent. Ex. 2011, 15. Crestron is a sophisticated engineering company, and has been a leading innovator in the commercial and residential control and automation solutions for over 40 years. Ex. 2019. Crestron's sophistication relating to intellectual property is evidenced by their ownership of 460 separate patents in numerous fields including the following CPC codes: electric digital data processing, fixed or movable closures for openings in buildings, vehicles, fences or like enclosures in general, loudspeakers, microphones, gramophone pick-ups or like acoustic, electromechanical transducers, printed

² The Provided Financial Data is through Q3 of 2024.

circuits, and transmission of digital information. Ex. 2019. Crestron is a competitor of Patent Owner. Ex. 2023, 28:22-29:16.

[REDACTED]
[REDACTED]
[REDACTED] Ex. 2011; Ex. 2023, 58:10-59:17, 66:22-67:7. It is true that the license covers more than just the '951 Patent, it covers the entire Barco Clickshare Portfolio. Ex. 2011, 15. However, “[l]icenses to the challenged patent then, unlike products or other forms of objective evidence of nonobviousness, do not require a nexus with respect to the specific claims at issue, nor does our nexus law require that a particular patent be the only patent being licensed or the sole motivation for entering into a license.” *Ancora. v. Roku*, 2025 WL 1679967, at *7 (Fed. Cir. June 16, 2025). As Crestron is an industry leader in the presentation space, it is presumed that it performed a significant investigation into the validity and infringement of the patents covered by the license, thereby strengthening the evidentiary value of the Crestron license for the purpose of proving nonobviousness. *RCA Corp. v. Data General Corp.*, 701 F. Supp 456, 471 (D.Del. 1988), *aff’d*, 887 F.2d 1056 (Fed. Cir. 1989); *B&H Manufacturing Inc. v. Foster-Forbes Glass Co.*, 26 USPQ2d 1066, 1070 (N.D. Ind. 1993) (the Licensees represented major industry players, which was found to be evidence that “they would not have bowed to pressure to take a license without first reaching the conclusion

that ultimately litigation would prove futile.”); *see also Columbia Broadcasting Sys. v. Sylvania Elec. Prods., Inc.*, 415 F.2d 719, 728 (1st Cir. 1969), cert denied, 396 U.S. 1061 (1970). Crestron also identifies the licensed patents on its website. Ex. 2018.

Upon agreeing to the license, Andrew Ludke, the Senior Director of Project Management at Crestron, praised Barco’s patented inventions stating that “Our customers expect fully integrated solutions that make workplace collaboration simple. With this agreement we will bring robust wireless conferencing based on Barco’s ClickShare intellectual property to our popular digital workplace technologies to meet the growing demand for BYOM solutions[.]” Ex. 2012. The license agreement, by Mr. Ludke’s own admission, has been “mutually beneficial”. Ex. 2023, 76:12-18. Given that Crestron has already paid more than the cost of litigation in licensing, its acquiescence to the validity of Barco’s patent portfolio is strong evidence of the non-obviousness of the ’951 Patent.

Crestron is not the only example of industry acquiescence. For example, in *Barco, Inc. et al v. Vivitek Corporation et al*, Case No. 4:19-cv-3250 (N.D. Cal. 4/27/2020), another competitor in the industry in 2019 agreed to a Consent Judgment and Permanent Injunction regarding certain patents owned by Patent Owner, including U.S. Patent No. 8,756,348, which is the parent of the ’951 Patent. Ex. 1001, Title Page; Ex. 2020, 2; Ex. 2021. Likewise, other competitors, such as Sahara

Presentation Systems changed the design of their competing product rather than face liability for patent infringement. Ex. 2021 (“Barco ended its case against Sahara Presentation Systems after obtaining that its Clevershare products were materially redesigned to avoid patent infringement.”).

VII. CONCLUSION

For the reasons set forth above, the patentability of all claims of the '951 Patent should be upheld.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

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