

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

BARCO N.V.
Patent Owner

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

PETITIONER'S REPLY

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TABLE OF EXHIBITS

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

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

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

EXHIBIT	DESCRIPTION
Ex-1083	Second Declaration of Declaration of Kevin C. Almeroth, Ph.D.
Ex-1084	Dr. Brogioli Dist. Ct. Transcript
Ex-1085	USB Audio Class System Driver (Usbaudio.sys) (https://learn.microsoft.com/en-us/windows-hardware/drivers/audio/usb-audio-class-system-driver--usbaudio-sys-)
Ex-1086	U.S. Patent No. 10,762,002
Ex-1087	U.S. Patent No. 11,403,237
Ex-1088	U.S. Patent No. 11,258,676
Ex-1089	RESERVED
Ex-1090	Deposition transcript of Andrew Ludke, Crestron
Ex-1091	Deposition transcript of William Scally, Barco's damages expert

I. INTRODUCTION

The Patent Owner's Response ("POR," Paper 19) suffers from three fundamental errors. First, the POR repeatedly mischaracterizes the claims by attempting to require that "*an input device... that triggers transfer of...media content*" must trigger transfer with 100% reliability. POR, 27, 33-34. Barco's trigger of the transfer of media content can fail. Ex-1001, 11:43-48; Ex-1072, 31:19-34:22 (discussing Ex-1067, 43-44 (sometimes "you are blocked" from connecting)); Ex-1075; Ex-1073, 4:25-7:2 (Dr. Brogioli testifying on other ways Barco's product could fail to connect), 9:10-10:25 (discussing the same regarding the how the embodiments of the '951 patent may also fail). Even if transfer might be obstructed under certain conditions (e.g., whether like those encountered by Barco's own device or different), the references relied on in the Petition indisputably disclose "*an input device... that triggers transfer of...media content.*"

Second, the POR applies an unduly rigid test for motivation to combine, ignoring the Supreme Court's guidance in *KSR Int'l Co. v. Teleflex Inc.* that common sense and the simple substitution of known elements suffice. 127 S.Ct. 1727, 1741 (2007). The prior art in screen sharing technology is dense, and Barco's patents merely combine known elements in predictable ways, as detailed in the Petition and further explained below. The agreed level of skill in the art in this proceeding is high, which means that the POSA would have a higher likelihood of seeing that the

combination of known elements would achieve predictable results relative to a POSA of lesser skill. Pet., 10. The Petition demonstrated how “the prior art as a whole suggested the desirability of the combination ..., thus providing a motivation to combine, which need not be supported by a finding that the prior art suggested that the combination claimed by the applicant was the preferred, or most desirable combination over the other alternatives.” MPEP § 2143.01.I. Moreover, as explained further below, the prior art provided suggestions and motivations for altering related prior art references to teach predictable results.

Finally, there should be no presumption of nexus to Barco's product because there are critical unclaimed features, such as the ability of Barco's products to function without a dongle. *See* Ex-1076, Ex-1077. Barco also fails to otherwise demonstrate that any revenue for its product or from its licensee resulted from the claimed features. Therefore, Barco failed to meet its burden to demonstrate secondary considerations.

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

Barco points to Dr. Almeroth's “data is data” statement (POR, 10-11, citing Ex-2006, IPR2024-01436) from his multiple declarations and depositions to imply inconsistency. However, his comment simply states the well-known fact that all computer data is binary (1's and 0's) and transmitted via interfaces like USB, regardless of type. This does not indicate any deficiency in his expertise.

In another proceeding, Dr. Almeroth testified about prior art addressing transcoding data “based on a type of functional data,” demonstrating the routine use of different codecs for audio and video data (Ex. 2030, ¶¶212-213). This is unrelated to his “data is data” comment in the ’1436 IPR, which simply reaffirms that all digital data is transmitted as 1’s and 0’s over interfaces like USB. Barco’s claim that Dr. Almeroth is unclear about the definition of “driver” is unfounded, as he provided a specific definition for this context, and the term varies by context.

Barco spends four pages challenging Dr. Almeroth’s view that implementation details are design choices, alleging unreliability and inconsistency (POR, 12-16). This argument improperly limits prior art to explicit disclosures and ignores the flexibility recognized by a person of ordinary skill. As stated in *KSR*, 127 S. Ct. at 1741, courts may consider inferences and creative steps made by such a person. Therefore, Barco’s position lacks support under current legal standards. Ex-1083, ¶¶2-5.

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

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

The Petition explained how and why the POSA would have combined Ono and Corbett. Pet. 21-23, 31-33 (citing Ex-1007, ¶¶22-23 (discussing a physical actuator on a peripheral device)). Ono discloses a remote control or buttons on a projector to select the source of data to be transmitted. Ex-1005, ¶¶83, 161. Corbett

discloses a similar peripheral device that transmits data to an external device and recognizes that a user input device for triggering data transmission could be displayed on a host computer or a physical actuator. Ex-1007, ¶¶17-20, 22-23. Corbett is from the same field of endeavor of peripheral devices for wireless data transmission as the '951 patent and is pertinent to the problem of improving the wireless transfer of data purportedly being solved by the '951 patent. It would have been obvious to transfer media content data using either method because there were a finite number of identified, predictable solutions for triggering media content transfer, each with the predictable result of transmitting media content data for display. *See also* Ex-1008, ¶19 (Ex-1012, 5:8-24); Ex-1009, ¶¶70-72; Ex-1083, ¶¶6-10.

Ono acknowledges that it would be possible “for each presenter to carry out output on/off operations at each information terminal apparatus.” Ex-1005, ¶161. The full quote is as follows:

since the information terminal apparatus whose image is to be shown on the screen 5 can be switched merely by operations from the remote controller 69 of the image display apparatus 1, even in cases, for example, where there are a plurality of presenters who are to present in a given order, it is unnecessary for each presenter to carry out output on/off operations at each information terminal apparatus in accordance with the order, and therefore, the gap in time until the next presentation is eliminated, and presentations can be conducted speedily.

Id. (emphasis added); *see also* ¶144. This is not a teaching away from having each user trigger transfer of media content because the fact “that ‘better alternatives exist in the prior art does not mean that an inferior combination is inapt for obviousness purposes.’ ” *Bayer Pharma AG v. Watson Lab’ys, Inc.*, 874 F.3d 1316, 1327 (Fed. Cir. 2017) (quoting *In re Mouttet*, 686 F.3d 1322, 1334 (Fed. Cir. 2012)); *see also Meiresonne v. Google, Inc.*, 849 F.3d 1379, 1382 (Fed. Cir. 2017) (“A reference that ‘merely expresses a general preference for an alternative invention but does not criticize, discredit, or otherwise discourage investigation into’ the claimed invention does not teach away.” (quoting *Galderma Labs., L.P. v. Tolmar, Inc.*, 737 F.3d 731, 738 (Fed. Cir. 2013))).

In *Meiresonne*, the prior art reference explained that graphical webpage previews were preferred over text because the user could “quickly filter through the vast information available from the simplest of searches,” and the addition of graphical previews makes web browsing “easier and more useful, even for the novice.” *Meiresonne*, 849 F.3d at 1383. The reference also identified “drawbacks” with descriptive text summaries. *Id.*, 1381. These “drawbacks” did not constitute a teaching away:

The fact that Finseth describes descriptive text as “[o]ften[] ... cursory, if not cryptic” does not automatically convert the reference to one that teaches away from combining text descriptions with a rollover window. This description implies only that text descriptions may be incomplete

or insufficient to fully understand the content. Finseth does not say or imply that text descriptions are “unreliable,” “misleading,” “wrong,” or “inaccurate,” which might lead one of ordinary skill in the art to discard text descriptions completely. The word “cursory” implies that the information is accurate but could use supplementation—it does not demand replacement.

Id. Here, too, Ono discusses a “gap in time” when switching the display by using “on/off operations at each information terminal apparatus.” Ex-1005, ¶¶144, 165. This gap in time is not a teaching away because allowing the presenter to switch control using the peripheral device would not render Ono “inoperative for its intended purpose” of allowing a plurality of computers to share their screens. *Meiresonne*, 849 F.3d at 1384; Ex-1005, ¶2.

In attacking the combination of Ono and Corbett, Barco argues that Corbett is not used for the transfer of arbitrary media content. POR, 24. First, nothing in Corbett prevents the data stored in the peripheral device from being arbitrary media content that a user wishes to share for display. Ex-1083, ¶8. Second, Barco fails to address the combination presented in the Petition. The Petition explains that Ono discloses transmission of arbitrary media content that is triggered by a user action on an input device, while Corbett recognizes that a user input device that triggers data transmission could be displayed on a host computer (claim 11) or a physical

actuator coupled to the peripheral device (claims 1, 16, 21). Pet. 31-33, 38-39. Ex-1007, ¶¶17-20, 22-23.

The POR contends that there was no design need to modify Ono's "*peripheral device*" to include the "*input device*". However, this is incorrect. Grimshaw and Uchida both illustrate the desirability in the art and thus provide a specific design incentive to make the proposed modification to Ono's wireless communications module. Ex-1008, ¶¶19; Ex-1012, 5:8-24; Ex-1009, ¶¶70-72. Specifically, each describes an input device located on a peripheral device, where the input device is a physical actuator that triggers transmission of the user's computer screen content to a shared display, and thus provide a function like Ono's remote controller. *Id.*, Ex-1005, ¶¶7, 144. Thus, a POSA would have found it obvious to provide such an input device with the peripheral device considering this known design incentive. *KSR*, 127 S.Ct. at 1731 ("[I]f a technique has been used to improve one device, and a person of ordinary skill in the art would recognize that it would improve similar devices in the same way, using the technique is obvious unless its actual application is beyond his or her skill.").

**B. There is No Dispute That the Ono-Corbett Combination Discloses
"an input device...that triggers transfer of said user selected arbitrary
media content."**

FIG. 9 of Ono indisputably illustrates a process that begins with and thus is triggered by a user pressing a button followed by an "image transfer" from a PC to

a projector. The fact that a connection might fail in some circumstances is irrelevant.

Indeed, the '951 patent explains that its connection will fail in some instances:

When the button was previously in state “connected” (see FIG. 6), it will check the state of the base unit (P). If the base unit is not in state “full”, the peripheral device will send the screen scraped arbitrary media content to the base unit (B), which will add the media content to the composition on the central display.

Ex-1001, 11:43-48. The connection will fail when the base unit is in the “full” state.

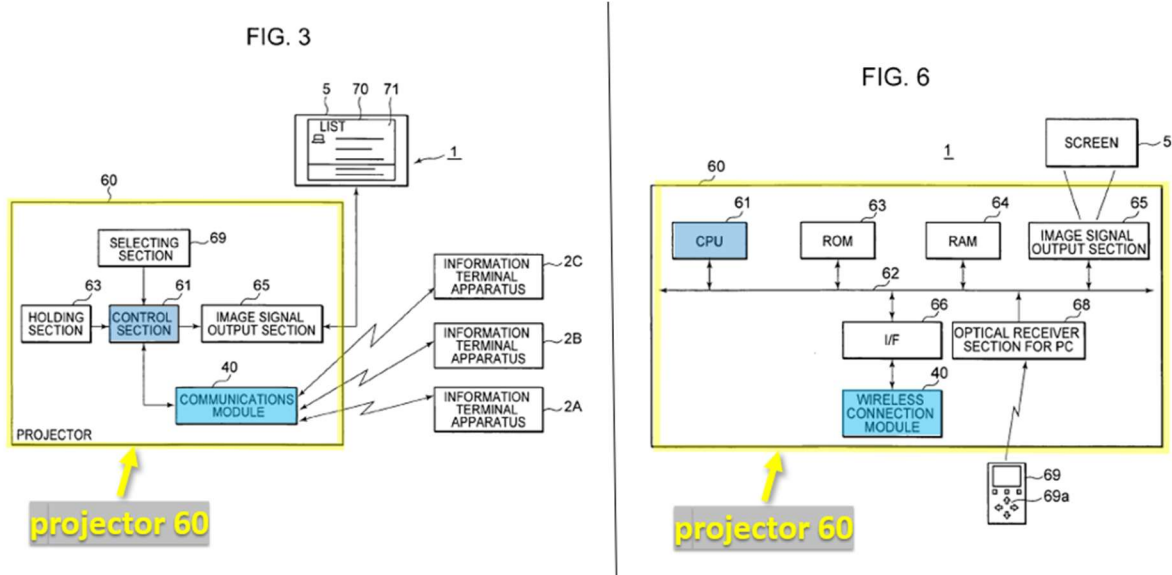
Ex-1072, 31:19-34:22 (discussing Ex-1067, 43-44 (sometimes “you are blocked” from connecting)). Barco’s system could fail in several ways. Ex-1075; Ex-1083, ¶¶11-12. Therefore, the claims of the '951 patent do not require 100% reliability when actuating the input device to trigger a transfer.

As just explained, Ono itself discloses the possibility of using a button “for each presenter to carry out output on/off operations at each information terminal apparatus.” Ex-1005, ¶161. Grimshaw supports the idea that Ono can have a button “at each information terminal apparatus.” *Id.*; Ex-1008, ¶19; Ex-1012, 5:8-24.

C. There Is No Dispute that the Ono-Corbett Combination Discloses the “*base node is integrated in the first display.*”

As explained in the Petition, Ono discloses the control section 61, also referred to as central processing unit (CPU) 61, (the “*base node*”) “*is integrated in*” the image display apparatus 1 (“*the first display*”). Ex-1005, ¶¶42-43, 50-52, 89, FIGS. 1-3, 6-7, 9; Ex-1002, ¶¶128-130. A POSA would have considered these elements to be

“integrated” at least because the ’951 patent describes a similar example base node-display arrangement as “integrated.” Ex-1002, ¶¶128-130. As explained further in the Petition, a POSA would also have known that integration of components was a common design choice that would have reduced complexity by eliminating the need for a separate wireless communications module and the need to couple it to the projector and would therefore have been motivated to make such a modification. Pet., 33-34.



Ex-1005, FIGS. 3, 6.

Barco’s argument that this limitation is not disclosed by Ono hinges on a POSA believing that a “projector is not a display.” POR, 28. However, this is contrary to the common understanding that a projector is a type of display and the teachings of the 951 patent. Ex-1083, ¶¶13-14. More importantly, the ’951 patent itself expressly indicates that “[t]he display 44 may be a **projector** and screen.” Ex-

1001, 14:37-38. The '951 patent also clarifies with respect to a fifth embodiment: “[T]he base node is not realized as a separate physical box, but [is] **integrated into the processing unit inside a display or projector.**” Ex-1001, 24:51-54 (emphasis added). Based on this, a POSA would have understood that, when the display is a projector and a screen and the “*base node is integrated in the first display,*” the base node is integrated in the projector without requiring the base node to also be integrated into the screen. Therefore, the “*base unit*” (wireless connection module 40) is “*integrated*” in the “*first display*” (projector 60), as shown in FIGS. 3 and 6 of Ono. *See also* Ex-1073, 17:8-18:2 (Dr. Brogioli agreeing that the '951 patent defines a projector and screen as a “*display*”).

IV. GROUND II – UCHIDA AND GRIMSHAW RENDER OBVIOUS CLAIMS 1-10 AND 14-21.

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

Barco's arguments address a modification of Uchida and Grimshaw not presented in the Petition. Rather than addressing the grounds presented in the Petition, the POR focuses on features related to updating wireless setting information using a remote control from Uchida being removed via a combination of Uchida and Grimshaw that was not presented in the Petition. The Petition demonstrates that Uchida discloses a “*peripheral device*” (e.g., wireless device 1) that includes “*an input device*” (e.g., image transfer stop switch 140) “*configured to allow the user to carry out a user action on the input device that triggers transfer*” (e.g., sliding switch

140 to trigger transfer) “*of said user selected arbitrary media content ... the input device being a physical actuator*” (e.g., slide switch 140) “*coupled to the at least one peripheral device*” (wireless device 1). Ex-1009, ¶¶10-13, 39-40, 70-72, 134, 139, 176, FIGS. 1-3; Ex-1002, ¶¶161-168, 180-182. Pet., 57-58. Grimshaw further that the input device is a physical actuator on a peripheral device. Ex-1008, abstract, ¶4-5.

Barco also argues that centralization of the image sharing process is critical to Uchida. POR, 42. This is incorrect. Uchida merely indicates that “wireless setting information can be updated every time the image projection device is used” without providing any indication or suggestion that control of media content transfer *must* be centralized. Ex-1009, ¶31. Uchida, ¶31 describes updating wireless setting information for new conferences to prevent image sharing from devices that participated in a previous conference. The proposed modification of Uchida based on Grimshaw does not remove the ability to update wireless connection information for new conferences. *See* Ex-1083, ¶¶15-17. Triggering the transfer of media content is a separate consideration from updating the wireless setting information for a new conference.

As discussed above regarding the Ono-Corbett combination, the presence of better alternatives in the prior art does not make a less optimal combination unsuitable for obviousness. *See Bayer Pharma AG v. Watson Lab'ys, Inc.*, 874 F.3d

1316, 1327 (Fed. Cir. 2017) (citing *In re Mouttet*, 686 F.3d 1322, 1334 (Fed. Cir. 2012)). Similarly, a reference showing a general preference for an alternative but not criticizing or discouraging the claimed invention does not teach away. See *Meiresonne*, 849 F.3d at 1382 (quoting *Galderma*, 737 F.3d at 738). See § III.A, *supra*.

As in *Meiresonne* (see § III.A, *supra*), Uchida discusses updating “wireless setting information” with a remote control in between uses of the system. Ex-1009, ¶31. Performing this update with a remote control is not a teaching away from allowing the presenter to switch control using an input device coupled to the peripheral device. Including such control would not render Uchida “inoperative for its intended purpose” of allowing a facilitating communication between a computer device and an image projection device. *Meiresonne*, 849 F.3d at 1384; Ex-1009, Abstract.

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

B. There Is No Dispute That the Uchida-Grimshaw Combination Discloses “*an input device...that triggers transfer of said user selected arbitrary media content.*”

The POR argues that the image transfer stop switch of Uchida does not trigger transfer of media content. POR, 44-45. This is incorrect. Firstly, Dr. Brogioli admitted that “when the toggle is turned back to ‘off,’ the image data coming from the wireless device is projected again.” Ex-1072, 3:3-12.

Secondly, Uchida teaches that after activating “image transfer stop switch 140” the client computer “executes an image transfer application and transmits a request to the image projection device 3 ... to project a specific image ... on the image projection 50 device 3.” Pet., 57–58 (citing, Ex-1009, ¶71). Grimshaw also shows that a user can push a button on a user module to trigger transmission of image data. Pet., 58-59. The presence of other device components in the data transfer pathway does not change that Grimshaw indisputably discloses to trigger transmission with buttons:

a user may engage or push a button 344, 354, 364, 374 on their user module in order to take control of display module 22 (e.g., display module 22 could show whatever is currently being displayed on the screen of the laptop computer connected to the selected user module).

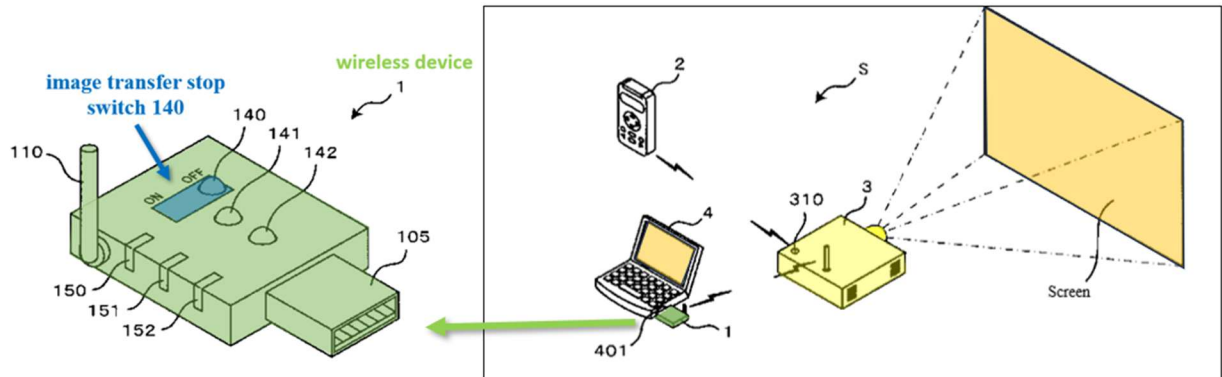
Ex-1008, ¶¶19-20; Ex-1012, 5:8-6:17; see also Ex-1073, 15:22-16:6 (Dr. Brogioli testifying that Grimshaw’s button “*triggers transfer [of] media content*”). Therefore,

the combination of Uchida and Grimshaw renders obvious the “*input device*” limitation.

As also addressed above in § IV.A, Barco’s arguments are based on an improper reading of Uchida that incorrectly links (A) the updating of wireless setting information to prevent unwanted image sharing from previous users to (B) the triggering of image transfer by moving the image transfer switch to a position that allows and thus triggers image transfer. As explained in the Petition, Uchida discloses that

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

Ex-1009, ¶71; Pet. 58. Since moving the switch to the “ON” position stops image transfer, a POSA would have understood that sliding it back to the “OFF” position resumes (and thus triggers) image data transmission. Ex-1009, ¶¶70-72; Ex-1002, ¶¶162, 180-182; Pet. 58; Ex-1083, ¶22.

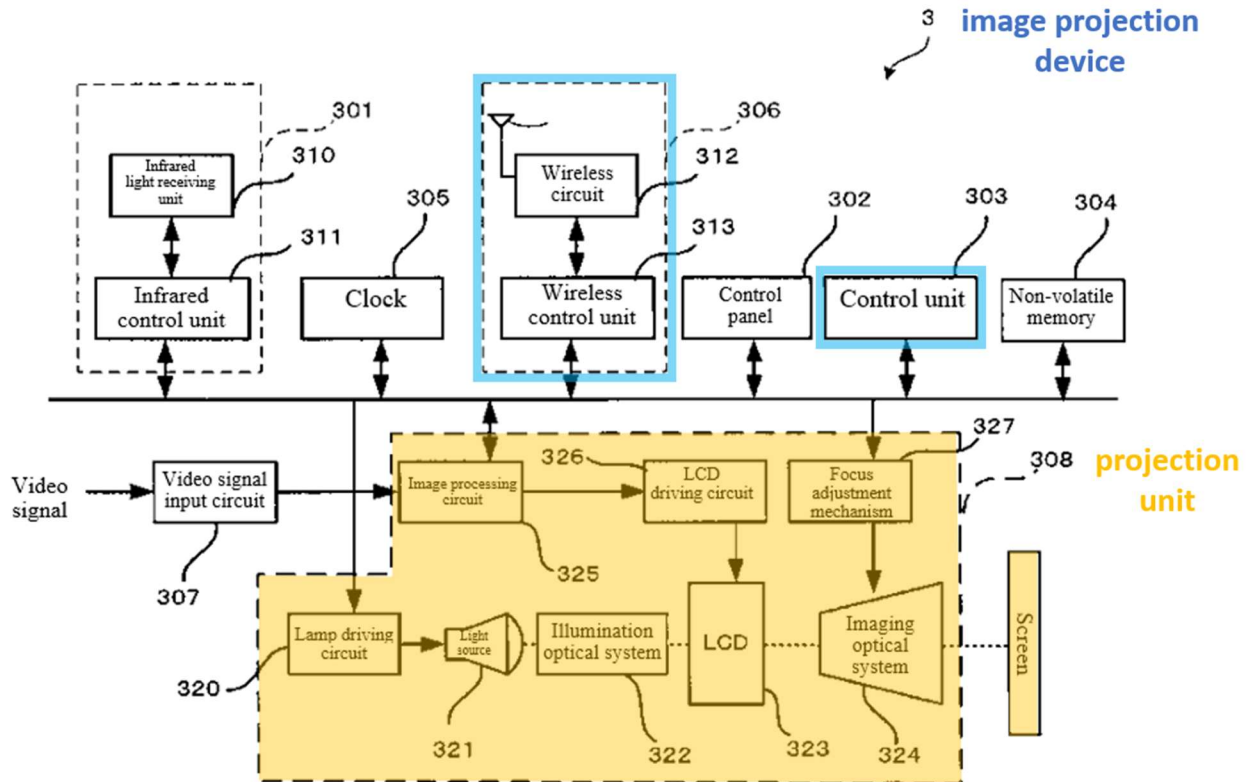


Ex-1009, FIGS. 1, 3.

As also described above, Barco mischaracterizes the teachings of Uchida at ¶31, which describes updating wireless setting information for new conferences to prevent image sharing from devices that participated in a previous conference. Ex-1083, ¶¶18-23. These teachings are not linked to any operation of the image transfer stop switch, which can be actuated to stop or trigger media content transfer for display after the wireless settings are in place.

C. There Is No Dispute that the Uchida-Grimshaw Combination Discloses the “*base node is integrated in the first display*”.

Uchida specifically indicates that the “image projection device 3” (the “*display*”) “includes... a wireless unit 306” (the “*base node*”) “and a projection unit 308...**all of which are built into the housing.**” Ex-1009, 124 (emphasis added), FIG. 14 (reproduced below). Components built into the same housing are integrated. Ex-1083, ¶¶24-26.



Ex-1009, FIG. 14.

The POR's argument that Uchida does not disclose this limitation hinges on a POSA believing that the image projection device 3 is not a display because "projector unit 308, does not include the screen." POR, 46. However, this is contrary to the common understanding that an image projection device 3 of Uchida is a display. Ex-1083, ¶25. Furthermore, the image projection device 3 does include a screen as shown in FIG. 14 (reproduced above). Importantly, the '951 patent itself indicates that "the base node is not realized as a separate physical box, but [is] **integrated into the processing unit inside a display or projector.**" Ex-1001, 14:37-38 (emphasis added). Based on this, a POSA would have understood that,

when the display is a projector and a screen and the “*base node is integrated in the first display,*” the base node is integrated in the projector without requiring the base node to also be integrated into the screen. *See also* Ex-1073, 17:8-18:2 (Dr. Brogioli agreeing that the '951 patent defines a projector and screen as a “*display*”).

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

A. It Would Have Been Obvious to Modify Ichieda.

The Petition relied on Ichieda's third embodiment of an image display system 1 including a projector 50 and a laptop personal computer (PC) 90 (*i.e.*, image supply device), and information terminal 80 (*i.e.*, a cellphone). Ex-1006, ¶129. After data from the information terminal 80 is used to pair the laptop PC 90 to the projector 50, Ichieda indicates that the laptop PC 90 can transmit the image signal via communication section 96 to access point 70. Ex-1006, ¶150, FIG. 12 (reproduced below); Ex-1083, ¶27.

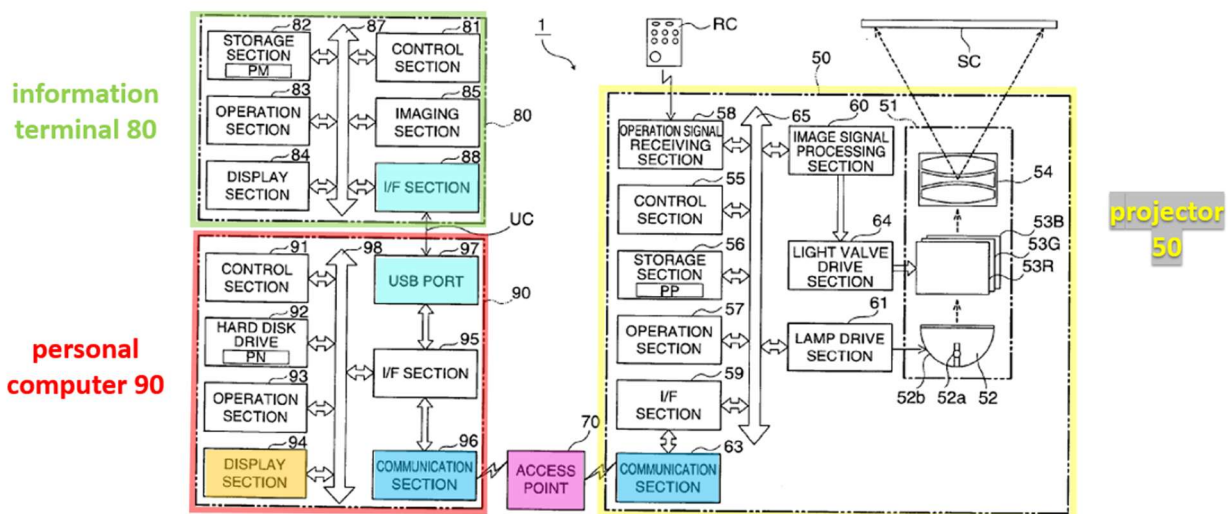


FIG. 12

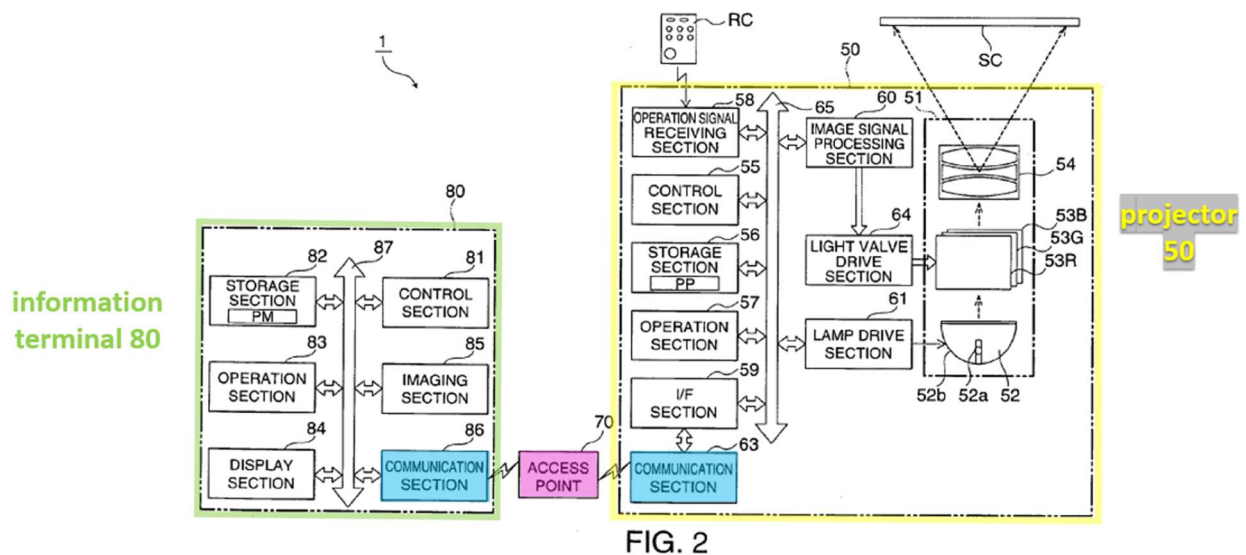
Ex-1006, FIG. 12.

However, Ichieda is not limited to this option for the routing image data to the projector 50 via the communication section 96 of the PC 90. Instead, Ichieda provides a limited number of obvious variations, such as sending data to information terminal 80 via USB port 97 to the interface section 88, and that communication section 86 can be used to transfer data to the projector 50. Ex-1006, ¶¶ 44, 72, 104, 136-137, FIG. 2 (reproduced below). As such, a POSA would have recognized that it would have been obvious to employ this known option when faced with a design need, such as the example of freeing the network card of the laptop PC 90 from use described in the Petition. Pet. 71.

Freeing a network card from use had known advantages for improved data security and increased device functionality. Ex-1083, ¶¶ 28-29. (For example, connecting the laptop PC 90 directly to a public network in the conference setting of Uchida might make the laptop PC 90 more vulnerable to attacks and expose sensitive or personal data stored on the laptop PC. Furthermore, freeing the network card may allow users to share media content via the information terminal 80, while the communication section 96 is free to be used for other purposes, such as connecting to the internet. *See, e.g.*, Ex-1053, 1 (“The really smart thing about Quicklink TV is multi-tasking. **Whilst streaming content to your TV [using the wireless USB adapter] you can also continue using your Laptop, Netbook* or Desktop PC as**

normal for work or leisure including the Internet - both at the same time!”

(Emphasis added)).) Employing this data routing option from Uchida is no more than the combination of known elements in a predictable manner based on known marketing and design incentives and would result in the predictable result of transferring media content from the laptop PC 90 to the information terminal 80 and then to the projector 50 via communication section 86.



Ex-1006, FIG. 2.

In the modified arrangement of Ichieda described above and in the Petition, pressing a button on operation section 83 “*triggers transfer of...media content.*” Ex-1006, ¶¶44, 60, 69 (“The operation section 83 is equipped with a plurality of operation buttons for performing various instructions to the information terminal 80 [such as] ‘a connection button’ for instructing the wireless LAN connection....”), 81-83, 107, FIGS. 3, 7, 13; Ex-1002, ¶¶228-229; Ex-1083, ¶30. As illustrated in the

various processes shown in Figures 3, 7, and 13, once a connection is established, the image signal is sent irrespective of whether the image signal is sent from the laptop PC 90 or the information terminal 80. *Id.*

B. There Is No Dispute That Ichieda Discloses “*an input device...that triggers transfer of said user selected arbitrary media content.*”

Barco's argument concerning this limitation is like that of the combination of Ono and Corbett. *See* § III.B. As explained, the fact that a connection might fail in some circumstances is irrelevant. Ichieda indisputably illustrates a process that begins with a user pressing a button followed by an “image transfer” from a laptop PC 90 to a projector 50. Indeed, the '951 patent explains that its connection will fail in some instances:

When the button was previously in state “connected” (see FIG. 6), it will check the state of the base unit (P). If the base unit is not in state “full”, the peripheral device will send the screen scraped arbitrary media content to the base unit (B), which will add the media content to the composition on the central display.

Ex-1001, 11:43-48. The connection will fail when the base unit is in the “full” state. Ex-1067, 31:19-34:22 (discussing Ex-1067, 43-44 (sometimes “you are blocked” from connecting)); Ex-1083, ¶¶31-33. Barco's system could fail in several ways. Ex-1075. Therefore, the claims of the '951 patent do not require 100% reliability when actuating the input device to trigger a transfer, and Ichieda discloses the “*triggers transfer*” limitation.

C. There Is No Dispute that the Ichieda Discloses the “*base node is integrated in the first display*.”

As addressed in § III.C and IV.C above, Barco's arguments again incorrectly hinge on a POSA believing a projector is not a display. Ichieda indicates that the “The projector 50 is an **image display device**” (*i.e.*, the “*display*”). Ex-1006, ¶ 44 (emphasis added). The projector 50 includes an integrated communication section 63 and control section 55 (*i.e.*, the “*base node*”). Ex-1006, ¶¶50, 60 (“[T]he communication section 63 can be arranged to use ... a wireless [LAN] module previously **built-in in the projector 50.**” (Emphasis added)), 162, FIGS. 2, 12; Ex-1002, ¶230. Components built into the same housing are integrated. Ex-1083, ¶¶34-36.

Ichieda discloses a screen (SC) in use with the projector 50. Importantly, the '951 patent itself indicates with respect to a fifth embodiment that “In this embodiment, the base node is not realized as a separate physical box, but [is] **integrated into the processing unit inside a display or projector.**” Ex-1001, 14:37-38 (emphasis added). Therefore, a POSA would understand that, when the display is a projector and a screen and the “*base node is integrated in the first display*”, the base node is integrated in the projector without requiring the base node to also be integrated into the screen. *See also* Ex-1073, 17:8-18:2 (Dr. Brogioli agreeing that the '951 patent defines a projector and screen as a “*display*”).

VI. SECONDARY CONSIDERATIONS DO NOT OVERCOME THE STRONG SHOWING OF OBVIOUSNESS

This is not a close case. Barco's arguments for patentability are weak, focusing on limitations squarely and admittedly in the prior art. Barco's arguments concerning rationale-to-combine question why the POSA would have altered the systems that are already fully functional. As explained throughout this reply, the law does not support these arguments. Moreover, Barco has failed to demonstrate nexus for any alleged commercial success.

A. Barco's ClickShare Product Lacks Nexus because It Is Not Essentially the Claimed Invention.

Barco is not entitled to a presumption of nexus “[w]hen the thing that is commercially successful is not coextensive with the patented invention—for example, if the patented invention is only a component of a commercially successful machine or process.” *Demaco Corp. v. F. Von Langsdorff Licensing Ltd.*, 851 F.2d 1387, 1392 (Fed. Cir. 1988)). Nexus is not shown when “the patented invention is only a component of a commercially successful machine or process.” *Id.* “[U]nclaimed features [must] amount to nothing more than additional insignificant features” to presume nexus. *Fox Factory, Inc. v. SRAM, LLC*, 944 F.3d 1366, 1374 (Fed. Cir. 2019)

Barco's ClickShare product is not coextensive with the claimed invention because it includes significant unclaimed features. For example, the ClickShare

product can work with or without a peripheral device (dongle) by using either the ClickShare app or other platforms, such as Teams or Zoom. Ex-1076 (Barco base unit sold without dongles and works with Teams and Zoom); Ex-1077 (Barco instructions for using a base unit without a dongle). Indeed, Mr. Ludke of Crestron testified that he was “surprised” that anyone would want to use a dongle because, “as you can just join a Teams meeting from your laptop without using” a dongle. Ex-1090, 100:25-101:20. Dr. Brogioli testified that he could not recall ever using a dongle to share content prior to this case. Ex-1084, 91:14-23. Using the ClickShare Product without the dongle is not an insignificant feature; nexus, therefore, cannot be presumed.

Importantly, Barco has several patents covering patentably distinct inventions including, for example, at least U.S. Patent Nos. 10,762,002 (the '002 patent, Ex-1086), 11,403,237 (the '237 patent, Ex-1086), the '951 patent, and 11,258,676 (the '676 patent, Ex-1088). Only the '951 patent has a terminal disclaimer and this is over a separate patent application 15/449,048 corresponding to U.S. Patent No. 10,585,814. Barco's Technology & Innovation Director testified that each patent is valuable in its own right, suggesting that the '951 patent is at most one of many reasons for Barco's revenue. Ex-1078, 141:20-143:18. Indeed, the '002 patent is directed to media sharing methods and systems that employ **separate pre-installed generic drivers to set up audio and data communication**, allowing audio data to

be routed to the peripheral device and to a base node over a communications network. The '237 patent is directed to connecting a processing device to a communications network using an external peripheral device that is **presented as a human interface device**, enabling the communication of audio and display data to the peripheral device and then to a base node over a network. The '676 patent is directed to an electronic meeting system that allows users to share arbitrary media content from their devices to a display through a network using a peripheral device **with rules for display control**. The '951 patent is directed to an electronic meeting tool that enables users to communicate and display arbitrary media content from their devices to a central display via a wireless network using a peripheral device **via a user input on a physical actuator on the peripheral device**. Thus, none is coextensive with the *entire* ClickShare product because there are several patents covering different critical features of that product.

B. Barco Failed to Demonstrate “Commercial Success” Due to the Claimed Features.

Barco's Evidence of revenue alone is insufficient to demonstrate secondary considerations without showing that those aspects are the “direct result” of the claimed features. *In re Huang*, 100 F.3d 135, 140 (Fed. Cir. 1996). Barco relied entirely on the presumption of nexus and made no attempt to demonstrate that revenue generated was due to the claimed features as opposed to significant unclaimed features. It is impossible to separate revenue generated from the claimed

features and other commonly used features, *e.g.*, compatibility with the ubiquitous Teams and Zoom tools. Indeed, Yealink stopped selling dongles in the U.S. but still has a business selling base units, demonstrating that base units have material value even without a dongle. Ex-1082. Barco's products are also perfectly functional without using a dongle or "*peripheral device*." Ex-1076, Ex-1077. Barco makes no attempt at the required showing of how much revenue is attributable to the claimed features as opposed to unclaimed features.

1. Barco Failed to Show the '951 Patent Covers Crestron's Products.

As for Barco's reliance on Crestron's products, Barco must show more than the mere existence of a license. *See Sibia Neurosciences, Inc. v. Cadus Pharm. Corp.*, 225 F.3d 1349, 1358 (Fed. Cir. 2000) ("[T]he mere existence of these licenses is insufficient to overcome the conclusion of obviousness"); *see also Merck & Cie v. Gnosis S.P.A.*, 808 F.3d 829, 838 (Fed. Cir. 2015) ("It is therefore difficult to determine the extent to which the licensing agreement was a result of the novel features in the [challenged] patent, as opposed to the other patents involved."). Yet Barco offers little beyond just that. In fact, the Crestron license included many unrelated and foreign patents, including those from a different patent family. *See* Ex-2011, 15. Moreover, Barco's damages expert, when addressing the same license, testified that the agreement was driven by underlying "business" factors and "benefits" beyond the patents themselves. *See, e.g.*, Ex. 1091, 73:7-74:3, 105:8-

106:1. [REDACTED]

[REDACTED] Ex-1090, 58:7-12.

There is no evidence that Crestron entered the license because it believed that Barco's patents were valid or enforceable. *Teva Pharms. Int'l GmbH v. Eli Lilly & Co.*, 8 F.4th 1349, 1364 (Fed. Cir. 2021). The Federal Circuit affirmed a Board decision holding the Patent Owner did not show "that any of the challenged patents cover the [licensee's] Product by a comparison of the [] product to the challenged claims." *Id.* Here, too, Barco fails to explain how Crestron's products embody the claim limitations. Therefore, there is insufficient evidence of a nexus.

VII. CONCLUSION

Barco's arguments fail to rebut the prima facie showing of obviousness, and the evidence of secondary considerations is insufficient. Petitioner therefore asks the Board to find the challenged claims to be unpatentable.

Dated: October 15, 2025

Respectfully submitted,

By: /Stephen Yang/
Stephen Yang
Reg. No. 70,589
Dentons US LLP

Lead counsel for Petitioner

CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned hereby certifies that the word count for the foregoing Petitioner's Reply totals 5,587 as counted by Word Count feature of Microsoft Word, which is less than 5,600 allowed under 37 C.F.R. § 42.24(a)(1)(i), excluding the parts of the paper exempted by 37 C.F.R. §42.24(a).

Dated: October 15, 2025

By: /Stephen Yang/
Stephen Yang
Reg. No. 70,589

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2025, I caused a true and correct copy of the foregoing Petitioner's Reply and supporting exhibits to be served on the Patent Owner at the following correspondence addresses of record:

akavathekar@hsml.com
christopher.centurelli@klgates.com
erik.halverson@klgates.com
joshua.andrews@klgates.com
tleee@hsml.com

Dated: October 15, 2025

Respectfully submitted,

/Stephen Yang/
Stephen Yang
Reg. No. 70,589
Attorney for Petitioner