

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 SUPPLEMENTAL INFORMATION

Exhibit List

Exhibit	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
Ex. 2014	<i>ClickShare Button</i> , BARCO (February 12, 2025)

Exhibit	Description
	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. 9, 2025) https://web.archive.org/web/20250409210411/https://learn.microsoft.com/en-us/windows-hardware/drivers/usbcon/supported-usb-classes

Exhibit	Description
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
Ex. 2033	December 1, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2024-01436, IPR2024-01437, IPR2024-01438 and IPR2024-01439
Ex. 2034	Patent Owner's Demonstrative (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2035	Declaration of D. Cai dated Jan. 12, 2026, filed in <i>Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al</i> , 2:23-cv-00521 (E.D. Tex.) on January 20, 2026, in support of Yealink's Motion for Compulsory License
Ex. 2036	Yealink's Motion for Compulsory License filed in <i>Barco, Inc. et al v. Yealink (USA) Network Technology Co., Ltd. et al</i> , 2:23-cv-00521 (E.D. Tex.) on January 20, 2026

The Board authorized this paper and entry of Exs. 2035 and 2036. Paper 55.

I. INTRODUCTION

Petitioner's unequivocal decision to resume selling its previously withdrawn and admittedly infringing WPP30 dongle products as stated in Ex. 2035 and its opposed motion seeking a compulsory license and on-going royalty to all challenged claims of U.S. Patent No. 11,422,951 (the "Challenged Patent") as set forth in Ex. 2036 fully supports a finding of nonobvious. Petitioner's conduct is direct proof of the necessity of the features of the challenged claims to compete in this marketplace. These actions are also directly contrary to Petitioner's arguments that the Crestron License and Barco ClickShare product's commercial success should be afforded no weight. Yealink's request for a *compulsory license* is strong evidence the Challenged Patent claims have significant commercial value, confirming the secondary considerations of non-obviousness should be given significant weight.

"After Barco filed its complaint...Yealink admitted that its WPP20 and WPP30 wireless presentation pods (or, dongles) infringed the asserted patents and withdrew them from the U.S. Market." Ex. 2036, 1; *see* Ex. 1082. Yealink points to this withdrawal as evidence that the Challenged Patent lacks commercial value. Paper 28, 29. Now, Yealink confirms it "has decided to reintroduce its WPP30 in the United States, and will resume selling its WPP30 dongle in 2026." Ex. 2035, ¶¶1, 14. Yealink's about-face regarding the commercial need to sell the WPP

products, which admittedly infringe the claims of the Challenged Patent and its failure to update the Board as to the inaccuracy of its prior record statements, coupled with its opposition to Patent Owner's attempts to correct the record, undermines Petitioner's arguments made throughout this proceeding. Exhibits 2035 and 2036 are direct evidence of the non-obviousness of the challenged claims, as Yealink requires Patent Owner's claimed technology to compete.

II. THE CLAIMED FEATURES ARE REQUIRED TO COMPETE

Yealink's conduct is an admission that the claimed features are required to compete. Mr. Cai's declaration is unequivocal: "Yealink has decided to reintroduce its WPP30 in the United States, and will resume selling its WPP30 dongle in 2026." Ex. 2035, ¶14. Yealink admitted the WPP30 infringes Claims 1–15 and 17–21 of the Challenged Patent when used with a base node. *See Barco Inc. v. Yealink (USA) Network Technology Co.*, No. 2:23-cv-00521 (E.D. Tex., filed Nov. 14, 2023), Dkt. 85; Dkt. 189. Claims 1–11 and 13–21 are challenged in this IPR. Paper 2, 2. Yealink's unwillingness to adopt a noninfringing alternative favors nonobviousness. *See Liqwd, Inc. v. L'Oreal USA, Inc.*, 941 F.3d 1133, 1137 (Fed. Cir. 2019) ("access to an issued patent coupled with circumstantial evidence regarding changes to competitor's design is sufficient to support copying."). To sell a successful product in this space, the claimed features are required.

Yealink moved for a *compulsory license*, over Barco's objections, to the

Challenged Patent, and proposes paying an ongoing royalty of ***\$54 per dongle***. Ex. 2036, 1. Yealink asserts that “Yealink remains willing to license Barco’s patents, and remains willing to ***pay Barco a royalty*** for its WPP30 sales in the United States upon its reintroduction.” Ex. 2035, ¶15 (emphasis added). Yealink’s desire to obtain a license to offer its WPP dongle products embodying the claimed features fully supports the need for these features to compete in this marketplace.

The Reply ignores Federal Circuit precedent and argues that the Crestron License should not be afforded weight due to the inclusion of patents in addition to the Challenged Patent. Paper 28, 29–30. Petitioner now acknowledges that a license to the Challenged Patent is required to effectively compete with Patent Owner and Crestron. Ex. 2036, 1. This confirms that Patent Owner’s objective indicia of nonobviousness should be given significant weight. The Reply also argues that Barco’s ClickShare System should be attributable to unclaimed, rather than the claimed, features. Paper 28, 26–29. This argument is contradicted by Petitioner’s conduct. Rather than implement the allegedly unclaimed features, Exhibit 2036 confirms commercial success stems directly from claimed features.

III. CONCLUSION

In addition to the reasons presented in the Patent Owner Response and Sur-Reply, Yealink’s own conduct set forth in Exs. 2035 and 2036 fully favors finding all challenged claims nonobvious.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2026, I caused a true and correct copy of the foregoing to be served on the following counsel of record for Petitioners by electronic mail to the following addresses:

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