

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: IPR2025-00491

U.S. PATENT NO. 10,684,972

MOTION TO SEAL

Exhibit List

Exhibit	Description
Ex. 2001	U.S. Publication No. 2015/0121466 (“Brands”)
Ex. 2002	U.S. Publication No. 2014/0362161 (“Leete”)
Ex. 2003	PTAB Memo
Ex. 2004	Email Authorizing Supplemental Paper of June 3, 2025
Ex. 2005	Curriculum Vitae of Dr. Michael Brogioli
Ex. 2006	September 22, 2025 Deposition Transcript of Kevin C. Almeroth
Ex. 2007	Reserved
Ex. 2008	Reserved
Ex. 2009	Reserved
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) https://web.archive.org/web/20250212164931/https://www.barco.com/en/product/clickshare-conferencing-button
Ex. 2015	Reserved

Exhibit	Description
Ex. 2016	Reserved
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	Reserved
Ex. 2021	Reserved
Ex. 2022	Reserved
Ex. 2023	Excerpts from April 18, 2025 Deposition Transcript of Andrew Ludke (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2024	Reserved
Ex. 2025	<i>ClickShare CX-30</i> , BARCO (October 8, 2025) https://web.archive.org/web/20250826005128/https://www.barco.com/en/product/clickshare-cx-30
Ex. 2026	David Martens and Willem Van Iseghem, <i>Security Whitepaper ClickShare Conference</i> , BARCO (March 23, 2020)
Ex. 2027	Gary Kayye, <i>Here's a Detailed Look at the New Barco ClickShare Conference From the Launch Event in NYC</i> , RAVE (January 27, 2020) https://web.archive.org/web/20251017182523/https://www.ravepubs.com/heres-a-detailed-look-at-the-new-barco-clickshare-conference-from-the-launch-event-in-nyc/
Ex. 2028	Gary Kayye, <i>Here's a Detailed Look at the New Barco ClickShare Conference From the Launch Event in NYC</i> , RAVE (January 27, 2020) https://web.archive.org/web/20201021153400/https://www.ravepubs.com/heres-a-detailed-look-at-the-new-barco-clickshare-conference-

Exhibit	Description
	from-the-launch-event-in-nyc/
Ex. 2029	Rebekah Carter, <i>ClickShare Delivers Wireless Conferencing</i> , UC TODAY (March 19, 2020) https://web.archive.org/web/20251017184342/https://www.uctoday.com/collaboration/clickshare-delivers-wireless-conferencing/
Ex. 2030	Declaration of Dr. Michael Brogioli
Ex. 2031	Reserved
Ex. 2032	Modified Protective Order
Ex. 2033	February 27, 2026 Deposition Transcript of Kevin C. Almeroth
Ex. 2034	Patent Owner Demonstrative (<i>Confidential and Redacted Versions Filed</i>)
PROP. 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
PROP. 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

I. Introduction

Patent Owner requests that Patent Owner's Request For Director Review is sealed under 37 C.F.R. § 42.54. Good cause exists to seal Patent Owner's Request For Director Review because it contains sensitive, nonpublic information. A redacted version of Patent Owner's Request For Director Review is being filed herewith.

Patent Owner certifies that it has conferred with Petitioner through counsel, and Petitioner reserved its right to oppose this motion after it has reviewed the motion and the contents that Patent Owner seeks to seal.

II. Good Cause

In deciding whether to seal documents, the Board must find "good cause," and must "strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." *Garmin v. Cuozzo*, IPR2012-00001, Paper 36 (PTAB Apr. 5, 2013). Good cause for sealing material is established by demonstrating that the balance of the following considerations favors sealing the material: whether (1) the information sought to be sealed is truly confidential, (2) a concrete harm would result upon public disclosure, (3) there exists a genuine need to rely in the trial on the specific information sought to be sealed, and (4), on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record. *See*

Argentum Pharms. LLC v. Alcon Research, Ltd., IPR2017-01053, Paper 27 at 4 (PTAB Jan. 19, 2018) (informative); *see also Corning Optical Communications RF, LLC, v. PPC Broadband, Inc.*, IPR2014-00440, Paper 47 at 3 (PTAB Apr. 14, 2015).

Patent Owner's Request For Director Review cites and quotes confidential information in Exhibits 2011 and 2023 which have already been sealed in this proceeding. The balance of the *Argentum* factors favors sealing the documents at issue. Addressing the *Argentum* factors in turn:

First, the information Patent Owner seeks to seal is truly confidential. The Trial Practice Guide provides that "the rules aim to strike a balance between the public's interest in maintaining a complete and understandable file history and the parties' interest in protecting truly sensitive information." 77 Fed. Reg. 48756, 48760 (Aug. 14, 2012). Further, those rules "identify confidential information in a manner consistent with Federal Rule of Civil Procedure 26(c)(1)(G), which provides for protective orders for trade secret or other confidential research, development, or commercial information." *Id.* (citing 37 C.F.R. § 42.54).

The information sought to be sealed relates to highly confidential business practices information of Patent Owner and a third party, including confidential and sensitive information relating to licensing dealings between Patent Owner and the third party. This information is subject to confidentiality provisions of the

agreement itself, as well as is treated as confidential by Patent Owner in its regular business operations.

Accordingly, the unredacted version of the exhibits were marked as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY in this proceeding pursuant to an agreement between the parties. Neither Patent Owner nor the third party have made or intend to make this information publicly available.

Second, Patent Owner and the third party would suffer several concrete harms from the public disclosure of the confidential information sought to be sealed. The confidential information details sensitive financial terms, including licensing terms, and sales and pricing information, public access to this information would give Patent Owner’s competitors and would-be rivals unfair competitive advantages, including an otherwise unavailable insight into Patent Owner’s licensing terms, which would place the third party and Patent Owner at a disadvantage in future negotiations.

Third, there exists a genuine need to rely on the specific information sought to be sealed. License agreements and financial information such as those submitted herewith are the type of subject matter for which motions to seal are regularly granted. *See Beckman Coulter, Inc. at Sirigen II Ltd.*, IPR2022-01206, Paper 62 at *72-74 (PTAB Dec. 21, 2023) (granting motion to seal “financial or competitive information belonging to a third party” and a “license agreement that contain highly

sensitive financial competitive information and that the third party agreed to Patent Owner's use of these documents on the condition they be designed" under protective order.). Moreover, Patent Owner submits that there is a genuine need to rely on the information sought to be sealed to show evidence of secondary indicia of nonobviousness.

Fourth, on balance, an interest in maintaining confidentiality outweighs the strong public interest in having an open record. The public interest is well-served in keeping business information readily available and exchangeable between parties without the fear of incidental public exposure of confidential business information. By contrast, the public interest in having access to the confidential information in the documents sought to be sealed is minimal. Moreover, the sealing of this information will have minimal, if any impact at all, on the public's ability to follow the proceeding.

III. Conclusion

For the above reasons, Patent Owner requests that the Board seal and protect the Patent Owner and third party confidential information contained in Patent Owner's Request For Director Review.

Respectfully submitted,

Dated: August 27, 2026

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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 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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