

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: IPR2025-00597

U.S. PATENT NO. 11,966,346

MOTION TO SEAL

Exhibit List

Exhibit	Description
Ex. 2001	U.S. Publication No. 2015/0121466 (“Brands”)
Ex. 2002	June 30, 2025 Deposition Transcript of Kevin C. Almeroth
Ex. 2003	Reserved
Ex. 2004	Declaration of Dr. Michael Brogioli
Ex. 2005	Curriculum Vitae of Dr. Michael Brogioli
Ex. 2006	September 22, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2025-00491
Ex. 2007	December 12, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2025-00597
Ex. 2008	December 15, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2025-00598
Ex. 2009	Reserved
Ex. 2010	Reserved
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	Reserved
Ex. 2014	Reserved
Ex. 2015	Reserved

Exhibit	Description
Ex. 2016	Reserved
Ex. 2017	Reserved
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	Declaration of Dr. Kevin Almeroth in IPR2025-00491
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	Reserved
Ex. 2026	Reserved
Ex. 2027	Reserved
Ex. 2028	Reserved
Ex. 2029	Reserved
Ex. 2030	Reserved
Ex. 2031	Reserved
Ex. 2032	Modified Protective Order

I. Introduction

Patent Owner requests that Exhibits 2011 and 2023, and the Patent Owner Response (Paper 19) be sealed under 37 C.F.R. § 42.54 and requests that the parties agreed-upon Protective Order (Ex. 2032) be entered in this proceeding. Good cause to seal these documents exists because they contain sensitive, nonpublic information. Redacted versions of Exhibits 2011 and 2023 and the Patent Owners Response are being filed herewith.

Patent Owner certifies that it has conferred with Petitioner through counsel, and Petitioner stated it did not oppose certain information being sealed but wanted an opportunity to review all sealed content before deciding whether to oppose. Petitioner further indicated it did not oppose the entry of the agreed modified protective order.

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 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).

Exhibits 2011 and 2023 contain information that has been identified by Patent Owner and Third Parties as confidential business information and which were marked as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order in this case that was agreed-upon by the parties. The confidential business information of the Third Party has been produced in a district court action between Petitioner and Patent Owner and the Third Party has authorized its use in this proceeding, subject to the entry of the protective order, which Petitioner agrees to.

The Patent Owner Response cites to and quotes from the confidential portions of Exhibits 2011 and 2023. 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 confidential financial information of Patent Owner. This information includes 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 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 nor do they 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. Public access to this information would give Patent Owner's competitors and would-

be rivals unfair competitive advantages, including an otherwise unavailable insight into licensing terms, which would place the third party and Patent Owner and third party at a disadvantage in future negotiations.

Third, there exists a genuine need to rely in the trial 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 establish that Patent Owner’s products practice the claims that Petitioner has challenged in this IPR proceeding, that those products are commercially successful, and to evidence additional 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 following he proceeding.

For the Board's convenience, good cause for sealing each document is addressed in turn below:

Exhibit 2011 – Patent License Between Barco and Crestron

Exhibit 2011 contains sensitive financial information and licensing terms between Barco and third-party Crestron. Exhibit 2011 is subject to confidentiality obligations owed to a third party, and that third party has authorized the use of this exhibit subject to its sealing and treatment as confidential under the modified agreed protective order submitted in this case. The third party agreed to Patent Owner's use of these documents on the condition that they be designated as "HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL ONLY" and be treated as such pursuant to the Modified Protective Order.

Exhibit 2023 – Deposition Transcript of Andrew Ludke

Exhibit 2023 is a deposition transcript discussing Exhibit 2011, the terms of the agreement and the negotiation process. Exhibit 2023 is subject to confidentiality obligations owed to a third party, and that third party has authorized the use of this exhibit subject to its sealing and treatment as confidential under the modified agreed

protective order submitted in this case. The third party agreed to Patent Owner's use of these documents on the condition that they be designated as "HIGHLY CONFIDENTIAL – OUTSIDE COUNSEL ONLY" and be treated as such pursuant to the Modified Protective Order.

Patent Owner Response

The Patent Owner Response includes confidential information. Specifically, the Patent Owner Response includes confidential information provided in one or more of the above exhibits. Accordingly, Patent owner respectfully requests that any confidential information included in the Patent Owner Response be redacted and that the unredacted version of the Patent Owner Response be sealed for the reasons given above with respect to the cited documents detailed above.

III. Protective Order

Patent Owner certifies that it has conferred with Petitioner through counsel, and Petitioner does not oppose entry of the Protective Order, filed in this case as Exhibit 2032. Patent Owner is contemporaneously filing a Motion for Protective Order.

IV. Conclusion

For the above reasons, Patent Owner requests that the Board seal and protect the Patent Owner and Third-party confidential information contained in the Patent Owner Response and Exhibits 2011 and 2023.

Respectfully submitted,

Dated: January 15, 2026

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

Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 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:

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

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