

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: IPR2025-00598

U.S. PATENT NO. 11,966,347

PATENT OWNER'S SUR-REPLY

TABLE OF CONTENTS

I.	Introduction	1
II.	Ground 1	2
A.	Claims 1 and 12	2
B.	Claims 23 and 27	8
C.	Dependent Claims	8
D.	Motivation to combine	10
III.	Ground 2	12
A.	Claims 1 and 12	12
B.	Dependent Claims	18
C.	Motivation to combine	20
IV.	Evidence Establishes Non-Obviousness of the Invention	22
A.	The Crestron License	22
B.	Commercial Success	23
V.	Conclusion	25

TABLE OF EXHIBITS

Exhibit	Description
Ex. 2001	U.S. Publication No. 2015/0121466 (“Brands”)
Ex. 2002	Reserved
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	Reserved
Ex. 2008	December 15, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2025-00598
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

Exhibit	Description
	.com/en/product/clickshare-conferencing-button
Ex. 2015	Reserved
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)

Exhibit	Description
	https://web.archive.org/web/20201021153400/https://www.ravepubs.com/heres-a-detailed-look-at-the-new-barco-clickshare-conference-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	Video: RAVE [PUBS] <i>Barco Debuts ClickShare Conference at Launch Event in NYC!</i> , at 0:00 to 5:13 (Streamed live on YouTube, Jan. 27, 2020) https://www.youtube.com/live/SnOk-VjUJ0U .
Ex. 2031	Excerpts from April 25, 2025 Deposition Transcript of Erwin Six
Ex. 2032	Modified Protective Order
Ex. 2033	May 14, 2026 Deposition Transcript of Kevin C. Almeroth

I. INTRODUCTION

The Petition presented two obviousness combinations mixing and matching different elements of distinct systems without identifying any teachings in the cited reference to reconcile these distinct approaches. Despite this hindsight-driven approach, the Petition still failed to meet all claim limitations of U.S. Patent No. 11,966,347 (the “’347 Patent”).

Beel and *Kaplan* (the two primary references) describe presentation-based systems, which do not interact with the functional device of the ’347 Patent claims, nor include the data communications necessary to support the claimed transmission path.

Dinka (the reference allegedly combined with *Beel*) describes the use of VoIP applications on personal devices and favors use of television systems with embedded hardware for VoIP communications in meeting room settings. *Dinka* fails to remedy the deficiencies of *Beel*. *Van de Laar* (the reference allegedly combined with *Kaplan*) describes wireless docking in large lecture rooms with distinct presentation/attendee classes to ensure smooth operation and fails to remedy the deficiencies of *Kaplan*. The combinations of these systems are loosely tied together through broad characterization of similarities and allegations that they would be combined to achieve the very functions claimed by the ’347 Patent. Only through hindsight is this system reconstructed by the cited references.

Finally, Barco’s evidence of secondary considerations, including the Crestron license, serve as strong evidence that the claimed system was recognized as innovative and supports characterization of the Petitioner’s reconstruction as improper hindsight.

II. GROUND 1

A. Claims 1 and 12

1. “the base unit being configured to transmit and the first peripheral device being configured to receive first processed video data over the communications network”

The Reply identifies two disclosures in *Beel* and further points to *Dinka* as allegedly disclosing this limitation. *See* Reply, 5–7 (citing Ex. 1005, ¶¶71, 120).

Beel does not disclose the base unit transmitting data and the first peripheral device receiving that data. Ex. 1001, Cls. 1, 12. First, paragraph 71 of *Beel* does not specify which display (the laptop display or the base node display) is displaying the media content. *See* POR, 15–16. Paragraph 71 describes displaying content in accordance with a set of rules. Ex. 1005, ¶71. Every other instance describing the “set of rules” discloses displaying content on the base node. POR, 15–16 (citing Ex. 1005, ¶¶71, 75, 123, 132, 135, 147–157); Ex. 2033, 25:11–28:7. The Reply provides no substantive response to this argument. *See* Reply, 5–7.

Second, while paragraph 120 of *Beel* does disclose “microphones 38 transmitting audio data ‘to the processing devices 31,’” there is no description in *Beel* of this transmission being performed from the base node to peripheral

device. Reply, 6; Ex. 1005, ¶120; *see infra* Section II.A.2. Accordingly, neither paragraph 71 nor 120 of *Beel* teaches this limitation.

The Reply presents a new theory not argued in the Petition. *See* Reply, 6 (“Even if *Beel* alone were insufficient, *Dinka* expressly teaches bidirectional communication.”). The Petition did not identify any teachings from *Dinka* to challenge this limitation so this argument is waived. *See* Petition, 23–24; *Intelligent Bio-Systems, Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1369 (Fed. Cir. 2016) (“It is of the utmost importance that petitioners in the IPR proceedings adhere to the requirement that the initial petition identify ‘with particularity’ the ‘evidence that supports the grounds for the challenge to each claim.’”) (citing 35 U.S.C. §312(a)(3)).

The Petition relies on *Dinka* for its teachings of hosting Skype calls; there is no articulation of how a POSITA would interpret its teachings to modify the peripheral device-base node architecture Petitioner relies on from *Beel*, other than use of Skype on *Beel*’s “data sharing technology.” *See* Petition, 17. This does not teach using the claimed base unit peripheral device transmission path.

2. “the functional device being configured for first video data to flow into the base unit or first video data is captured in the base unit, the first video data being processed in the base unit to generate the first processed video data, wherein the first processed video data is sent to the first peripheral device,”

The Petition relied on cameras 39, 40, 41, and 35 depicted in *Beel* Figure

1a. Petition, 24–25. First, the POR explained that cameras 39, 40, and 41 may be linked to the base node, but are used to capture meeting events and provide a recording of the meeting events. POR, 17–19 (citing Ex. 1005, ¶¶114, 116–117, 119–121). Second, there is no teaching that camera 35 is even connected to the base node. Rather camera 35 utilizes a connection unit to communicate data to a network. POR, 19. Therefore, *Beel* fails to teach video data being sent to the first peripheral device. *Id.*

The Reply quotes the institution decision, yet it fails to identify any passage in *Beel* that discloses this limitation. Reply, 7. Evidence has been present since the POPR (*see* POPR, 25) explaining the deficiency of the disclosed cameras. *See* Ex. 1005, ¶¶114, 116–117, 119–121. The Reply provides no counterargument.

The Reply attempts to dismiss the POR’s argument regarding camera 35, by contradicting *Beel*’s disclosure. Reply, 7–8 (“Patent Owner argues camera 35 connects to a ‘connection unit,’ not the base node. POR, 19. Wrong.”). *Beel* expressly states:

Optionally, a camera 35 may be provided to record the entries on the whiteboard 45. ***The camera 35 may have a third connection unit 52 for connecting the camera 35 to the network 50 so that the data from the whiteboard can be recorded and stored or transmitted to other networks via router 42.*** The connection unit 52 may have an input device 53 as described above for the connection unit 47.

Ex. 1005, ¶119 (emphasis added).¹

There is no other description of camera 35 in *Beel*. See generally Ex. 1005. The only use of these cameras in *Beel* is to record the events of the meeting. Ex. 1005, ¶¶119, 120, 121. This is also consistent with the distinction between electronic meeting systems (e.g., presentation systems) and web conferencing in *Beel*. Ex. 1005, ¶84. Web conferencing hardware was independently connected to the network, separate from the presentation system. *Id.*

The Reply is also deficient regarding “the first video data being processed in the base unit to generate the first processed video data, wherein the first processed video data is sent to the first peripheral device[.]” Petitioner relies on base node code for “receiving, decrypting and decoding incoming arbitrary media content” and “encoding” video data, but in each of the cited instances, it is referring to either (1) data processing on the peripheral device (Ex. 1005, ¶¶67, 317, 320) or data received on the base node *from* the peripheral device. The Reply identifies no video data going in the claimed direction. Reply, 8; Ex. 1005, ¶¶72, 155.

3. “the first peripheral device being configured to process the first processed video data received by the first peripheral device to generate second video data,”

The POR identified that “[t]he Petition truncates quotes from *Beel* in an

¹ Emphasis added unless otherwise noted.

attempt to allege obviousness of this element.” POR, 20. The Reply fails to resolve this deficiency, and instead continues to mischaracterize *Beel*’s peripheral device as “receiving media content from the network and [processing it] for display,” using the same, misleading, truncated quote. Reply, 6–7 (citing Ex. 1005, ¶71).

The *Beel* disclosure states “receiving media content from the network and for displaying the media content *on the display* in accordance with a set of rules[,]” Ex. 1005, ¶71. As Dr. Almeroth testified, the only set of rules in *Beel* refers to receiving and displaying content on a display connected to the base unit, not a display at the processing device as required by the challenged claims. Ex. 2033, 25:11–28:7.

4. “the operating system of the processing device being configured to capture the second video data and to make it available through a custom or standard driver to either the host application or a 3rd party application running on the processing device or to other processing devices,”

Beel describes data communications *from* the processing device *to* the base unit via the peripheral device, not communications in the opposite direction as claimed. POR, 20–21. The drivers of *Beel* are not disclosed as being implemented to perform this claimed transmission path. Ex. 1001, Cl. 1 (“capture the second video data and to make it available through a custom or standard driver to either the host application or a 3rd party application”); Ex. 1005, ¶¶23, 25, 41–43, 79, 95, 137, 174, 187, 205, 221, 317–323. *Dinka* is not relied on for this aspect of the claim limitation. POR, 21 (citing Petition, 27). The Reply does not respond to the POR

on this point.

5. “at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device,”

Beel does not describe or teach the claimed endpoints of the functional device. The POR articulated this point, as did Dr. Brogioli. POR, 21–22; Ex. 2004, ¶98. The Reply merely reiterates similarities between Figure 11 in *Beel* and Figure 4 in the '347 Patent and conflates Dr. Brogioli's testimony regarding whether a device is *an endpoint* or the *claimed endpoint* (of the functional device). Reply, 8–11. The Reply, like the Petition, does not identify the claimed endpoints.

The POR and Dr. Brogioli articulated that the evidence cited by Petitioner does not disclose how these endpoints are implemented in the '347 Patent. POR, 22–23; Ex. 2004, ¶99. The claimed endpoints are endpoints “of the functional device.” Ex. 1001 Cl. 1, 12. The Petition only identified communication of data from the processing device over the peripheral device, not communications of video data of a functional device connected to or in the claimed base unit returning in the opposite direction. POR, 22–23.

The Reply mischaracterizes *Beel* as disclosing “[d]ata from cameras and microphones flows through the network to the peripheral devices, which exposes it through endpoints.” Reply, 10. But this is the exact evidence that Petitioner has failed to identify. There is no identification of data communications in *Beel* from the cameras and microphones into the base node, from the base node to the peripheral

device, and then exposing that data to the processing device via the peripheral device. *See supra* Section II.A.2.

The teachings of *Christison* are relied on only for an “exposed natively” construction, and *Dinka* is not relied on for this limitation. Therefore, without *Beel* teaching the claimed transmission path and “endpoint of the functional device [] exposed on the first peripheral device[,]” Ground 1 fails.

B. Claims 23 and 27

The Petition and Reply provide no independent arguments for Claims 23 and 27. Petition, 37–40, 40–42; *see generally* Reply. Therefore, these Claims are nonobvious for the same reasons outlined *supra* Sections II.A.1–II.A.5.

C. Dependent Claims

The POR identified specific deficiencies in the Petition’s Ground 1 dependent claim challenges. POR, 24–25. Now, the Reply presents new arguments unrelated to the initial evidence presented in the Petition and unresponsive to the POR. These new arguments are waived. 37 C.F.R. §42.23(b).

1. Claims 2 and 13

The Petition identified features of a peripheral device and argued that a POSITA “would find it obvious to modify well-known technology to ‘move’ the code for encoding/encrypting or decoding/decrypting from the peripheral device onto the base node with the Base Node Software.” Petition, 31. The POR noted that the Petition provided no motivation to move this feature. POR, 24. In Reply,

Petitioner points to previously unpresented evidence of software for “auto-composing” in *Beel*’s base node when data is shared from the peripheral device to the base node. Reply, 13. The Reply also argues that Dr. Brogioli did not address “interpreting” but he had no reason to address this term when Petitioner presented no affirmative claim construction and argued that encoding performed in a peripheral device would be sufficient. Dr. Brogioli not providing a construction or opinion of “interpreting” is a result of Petitioner’s failure to present any features of *Beel*’s base node which would constitute interpreting. Petitioner’s argument is waived.

2. Claims 3 and 14

The Reply repeats its allegation that auto-composing is the same as mixing or multiplexing. Reply, 13 (citing Ex. 1062, ¶52). Dr. Almeroth testified this is not the case. Ex. 2033, 28:8–32:11. Accordingly, Claims 3 and 14 should be confirmed valid.

3. Claims 4 and 15

The Petition relied on its arguments on removing HID protocol headers to allege obviousness. Petition, 32. The POR explained that such allegations were unsubstantiated. POR, 24–25. The Reply now cites new features of the base unit and improperly attributes them to the peripheral device. *See* Petition, 32; POR, 24–25; Reply, 14 (citing Ex. 1005, ¶322); Ex. 1005, ¶322 (“Having been routed...*to the*

base unit...”). Accordingly, the arguments regarding Claims 4 and 15 are waived.

Moreover, Petitioner does not articulate any basis to move this functionality from the base unit to the peripheral device. The Reply also relies on paragraph 72 of *Beel* which is insufficient as articulated above with respect to paragraph 71. *See supra* Section II.A.1. Accordingly, Claims 4 and 15 should be confirmed valid.

4. Claims 5 and 16

The Petition only incorporated by reference its arguments from Claims 4 and 15 for Claims 5 and 16. Petition, 32. Now, the Reply argues that “[a] POSITA would find it obvious to demultiplex data for ‘incoming arbitrary media content’ obtained through Beel’s video mixing, using standard algorithms and decryption.” Reply, 13. This is a new argument, and by presenting it in its Reply, Petitioner has prevented Patent Owner from presenting expert testimony on this. Accordingly, this argument is waived.

D. Motivation to combine

A Petition must establish a persuasive motivation to combine to avoid the trap of hindsight. *KSR v. Teleflex Inc.*, 550 U.S. 398, 421 (2007) (“hindsight bias and must be cautious of arguments reliant upon *ex post* reasoning.”); *Metalcraft of Mayville, Inc. v. The Toro Co.*, 848 F.3d 1358, 1367 (Fed. Cir. 2017) (“we cannot allow hindsight bias to be the thread that stitches together prior art patches”); *Diamond Rubber Co. of New York v. Consolidated Rubber Tire Co.*, 220 U.S. 428,

434–35 (1911) (“Many things, and the patent law abounds in illustrations, seem obvious after they have been done, and, in the light of the accomplished result, it is often a matter of wonder how they so long eluded the search of the discoverer and set at defiance the speculations of inventive genius.”) (quotation omitted).

The ’347 Patent recognized that hardware capabilities on personal devices were inadequate in the virtual meeting context. Ex. 1001, 1:47–52. The ’347 Patent presents a system where improved hardware, such as webcams connected to a base unit, are made available to users. *Id.*, 10:39–51. Access to this hardware is possible through the claimed peripheral device and base unit. Ex. 1001, Cls. 1, 12.

Dinka also recognized the hardware limitations of existing mobile devices. Ex. 1006, 2:15–18. Rather than providing better functionality to these mobile devices, *Dinka* applied a different approach. *Dinka*’s meeting room system is a media appliance, with embedded functionality so that the media appliance can host a VoIP call using embedded hardware. Ex. 1006, Title, Abstract, 2:19–30, 7:17–21, 11:26–50. *Dinka* recognizes that PCs or laptops are capable of participating and hosting VoIP calls, but expressly teaches that in the meeting room context, its specialized television hardware system is preferred. *Id.*

The Reply advances an overly strict test, suggesting that a combination must be “unworkable” or else it “falls far short of teaching away.” Reply, 11–12. In fact, *Dinka*’s pervasive preference towards specialized television hardware systems with

embedded functions teaches away from the '347 Patent's Claims, which provides improved functional devices via the claimed base unit and first peripheral device video data transmission path. *Spectralytics, Inc. v. Cordis Corp.*, 649 F.3d 1336, 1343–44 (Fed. Cir. 2011) (pervasive general preference can amount to teaching away).

“Evidence suggesting reasons to combine cannot be viewed in a vacuum apart from evidence suggesting reasons not to combine.” *Arctic Cat Inc. v. Bombardier Recreational Products*, 876 F.3d 1350, 1363 (Fed. Cir. 2017). Moreover, *even if* evidence does not “rise to the level of teaching away,” it is still proper to consider that “a skilled artisan would be discouraged from pursuing such a combination.” *Id.*; *Laboratory Corp. of America Holdings v. Ravgen, Inc.*, No. 23-1342, 2025 WL 32904, at *4 (Fed. Cir. Jan. 6, 2025) (nonprecedential).

Absent Petitioner's hindsight reconstruction of the '347 Patent Claims, a POSITA would not arrive at the proposed system. Such hindsight reconstruction is especially unpersuasive in light of the secondary considerations of nonobviousness. *See infra* Section IV.

III. GROUND 2

A. Claims 1 and 12

1. “a first peripheral device being configured to be coupled to the processing device via a generic communications protocol”

The Petition argues that a POSITA “would have been motivated to modify the

receiver and data transmission system of Kaplan [] with Van de Laar's WDH to improve usability and connect multiple wireless devices and access the use of functional device(s) in a unified communication." Petition, 43. The Petition then goes on to indiscriminately rely on the transmission paths of *Van de Laar* and *Kaplan* without ever applying the claims to the teachings of the combination as argued. See Petition, 46–47 (relying on transmissions from *Kaplan's* USB transmitter for limitations c and d), 48 (relying on transmissions from Van de Laar's devices using Miracast limitation f), 53 (relying on transmissions from *Van de Laar's* WDH to secondary dockees for limitation i), 54–55 (relying on data communications via *Van de Laar's* Wi-Fi drivers for limitation k). Petitioner's inconsistent mapping does not teach the challenged claimed communication path.

Petitioner also relies on the same combination of prior art and the same motivations to combine those references to allege invalidity of a system that requires a peripheral device (this proceeding) and a system that expressly precludes communication through a peripheral. See IPR2025-00597. This broadly alleged combination, in tandem, with the indiscriminate citation of each reference, necessarily relies on improper hindsight reconstruction of the two challenged claim sets. *Metalcraft* 848 F.3d at 1367. At bottom, these inconsistencies fail to carry Petitioner's burden.

2. “at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device,”

The POR disputed that the combination taught this limitation. *See* POR, 36–37. The Reply provides no rebuttal.

3. “the base unit being configured to transmit and the first peripheral device being configured to receive first processed video data over the communications network,”

The Petition wrongly relied on features of primary and secondary dockees indiscriminately in its challenge. POR, 39–40. This reliance is not disputed. Reply, 16 (“This flexibility makes reliance on both functionalities proper.”). For Petitioner’s Ground 2 challenge to succeed, the Board must accept that relying on features of both the primary and secondary dockees is proper. This reading of *Van de Laar* is not supported by its disclosure.

Van de Laar teaches primary and secondary dockees having different access levels. Ex. 1007, ¶¶54, 56, 93. There are optional instructions to “transform” a dockee of one class into a dockee of another. *Id.*, ¶60. This supports an interpretation of distinct primary/secondary classes, which is entirely consistent with Dr. Brogioli’s testimony. *Id.*; Ex. 1060, 91:20–92:1. *Van de Laar* does not disclose a device acting as both a primary and secondary dockee simultaneously, as they are exclusively described as communicating with each other. At deposition, Dr. Almeroth further complicated this interpretation, arguing that a device could be a primary dockee for certain functional devices and a secondary dockee for others.

Ex. 2033, 36:5–13. This interpretation is not supported by *Van de Laar*’s disclosure. Moreover, it is insufficient to render the Challenged Claims—which are specifically about video data from a functional device—obvious. *See* Ex. 1001, Cl. 1, 12.

Kaplan does not remedy insufficiency. *Kaplan* does not disclose communications from the mapped receiver to the mapped transmitter. In fact, *Kaplan* expressly limits data communication from the transceiver to the computer during transmission. Ex. 1008, Table 1. Therefore, this Ground fails.

4. “the first peripheral device being configured to process the first processed video data received by the first peripheral device to generate second video data”

The POR explained that the Petition “provides no evidence that the communication unit 121 processes the video data.” POR, 40. Instead, the Petition identifies WDH functions in communicating data to the dockees. POR, 41.

The Reply does nothing more than dispute this argument. Reply, 15 (“Patent Owner argues the Petition conflates docking process 101 (in the WDH) with communication unit 121 (in the dockee). POR, 39–41. Wrong.”). Patent Owner does not dispute that the docking processor (in the WDH) is a separate component from the communication unit (in the dockee). Reply, 15. The Petition’s error is reliance on features in the WDH (the mapped base unit) as being performed by the first peripheral device (which the Petition equates to *Van de Laar*’s communication unit). Ex. 1062, ¶74. The Reply provides no evidence video processing occurs in

the communication unit 121 in the dockee. Therefore, Petitioner has presented no evidence that Ground 2 discloses a peripheral device configured to process video data to generate second video data.

5. “the operating system of the processing device being configured to capture the second video data and make it available through a custom or standard driver to either the host application or a 3rd party application running on the processing device or to other processing devices”

The POR disputes that the Ground 2 combination teaches (1) second video data being made available to the host application or 3rd party application and (2) whether Ground 2 teaches that video data is made available through custom or standard drivers.

Petitioner ignores a portion of the POR’s argument regarding the host application or 3rd party application. The POR explained that there is no disclosure of a secondary dockee making video data available over Skype, the relied on 3rd party application. POR, 43. Meanwhile, the primary dockee does not receive the second video data. *See supra* Section III.A.3. Because the secondary dockees are the only class of dockees that receive the shared video data (from the primary dockees) (POR, 37–40), there is no disclosure of the necessary video data transmission path over a third party or host application.

Petitioner responds only to the allegation that Skype and Miracast would not be used in the same *Van de Laar* implementation. POR, 44; Reply, 17. Even though

Skype communicates in the application layer and Miracast communicates in the transport layer, *Van de Laar* does not teach using these systems at the same time. *Van de Laar* describes communicating from the primary dockee to the WDH using Miracast. Ex. 1007, ¶¶124–126. “*In another embodiment*,” *Van de Laar* describes sharing content from the primary dockee to the WDH using Skype. Ex. 1007, ¶128. *Van de Laar* does not describe a system that uses Miracast and Skype at the same time. Dr. Almeroth’s only use case describes communicating between one set of devices using Miracast and between another set of devices using Skype. Ex. 2033, 40:1–41:12. This is not only contrary to *Van de Laar*’s disclosure where Skype and Miracast are described as communicating between the same devices, but also insufficient to teach making the video data available to a host application or 3rd party application. Ex. 1007, ¶¶124–126, 128.

6. “wherein third video data, received from the host application and/or from the 3rd party application running on the processing device, is sent to an endpoint of the first peripheral device via the standard generic driver,”

The POR disputed that the combination taught this limitation. *See* POR, 45–46. The Reply provides no rebuttal to the POR’s argument.

7. “the first peripheral device receiving the third video data and processing the third video data to form second processed video data,”

The Petition argued:

Van de Laar discloses that “*the first peripheral device*” (e.g., “communication unit 121”) “*receiving the third video data*” (e.g., “shared content”) “*to form second processed video data*” (e.g., generated “WFM packets”).

Petition, 56–57 (emphasis in original).

The POR explained that “the WDH, not the peripheral, ***generates the WFM packets.***” Reply, 17 (citing POR, 46–47). The Reply does not dispute this. *Id.* at 17–18. Instead, the Reply alleges that this limitation is met merely by the communication unit of the dockee acting as a WFM sink. *Id.*

The Petition relied on the “generated ‘WFM packets’” as the claimed processing and it is too late to change course. Petition, 56–57. *Intelligent Bio-Systems, Inc.*, 821 F.3d at 1369. Moreover, there has been no other identification of processing to meet this limitation.

B. Dependent Claims

The Reply presents unsupported or new arguments unrelated to the initial evidence presented in the Petition. These new arguments are waived. *Intelligent Bio-Systems, Inc.*, 821 F.3d at 1369; 37 C.F.R. §42.23(b).

1. Claims 23 and 27

The Petition and Reply provide no independent arguments for Claims 23 and 27. Petition, 66–68, 69–71; *see generally* Reply. Therefore, these claims are

nonobvious for the same reasons outlined *supra* Sections III.A.1–III.A.7.²

2. Claims 2 and 13

The arguments with respect to Claims 2 and 13 fail for the reasons outlined in the POR. *See* POR, 23.

3. Claims 3 and 14

The base unit enhances, mixes, multiplexes, or encrypts the data in preparation for transmission. Ex. 1001, Fig. 1, 13:62–64. Petitioner relies on adjusting or modifying the content displayed on the WDH. Reply, 24 (citing Ex. 1007, ¶123). This is not the mixing or multiplexing associated with transmitting this data. Ex. 2033, 28:8–32:11.

Moreover, this argument is raised for the first time on Reply. Petition, 59. Accordingly, this argument is waived.

4. Claims 5 and 16

The Reply relies on the multiplexing for Claims 3 and 14 to allege demultiplexing here. Petition, 24. As Claims 3 and 14 are not obvious, neither are Claims 5 and 16. *See supra* Section III.B.3.

5. Claim 28

The Petition relies only on previously made arguments when it comes to Claim 28. Petition, 71. The POR did the same. POR, 48. Now, the Reply presents

² III.A.7 does not apply to claim 27.

a full page of independent new argument for Claim 28. This new argument is waived.

C. Motivation to combine

Preliminarily, Petitioner contends “Patent Owner argues Kaplan requires custom software, suggesting incompatibility with generic drivers.” Reply, 21–22 (citing POR, 10–12). This was not in response to any argument in the POR. Accordingly, this argument is waived.

The Reply argues that, because Petitioner does not rely on *Kaplan*’s pairing protocol, this protocol is irrelevant. Reply, 19–21. The claims of the ’347 Patent describe communication between a peripheral device and a base unit. *See generally* Ex. 1001. Petitioner proposes a combination between *Van de Laar* and *Kaplan* for data transmission between multiple components. Petition, 43. The way in which these devices pair is a consideration a POSITA would make.

A reference must be considered in its entirety. *Huawei Device Co., Ltd., v. Optis Wireless Tech., LLC*, IPR2018-00585, Paper 20 at 39 (PTAB Sept. 16, 2019) (“A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention.”); *Innoscence (Zhuhai) Tech. Co., Ltd., v. Efficient Power Conversion Corp.*, IPR2023-01389, Paper 39 at 45 (PTAB Mar. 18, 2025) (“It is improper to use hindsight to pick and choose isolated disclosures in the prior art”). In the face of clear law the Board must

consider the full teachings of *Kaplan*, and cannot ignore the full scope of its teachings as Petitioner suggests.

Kaplan utilizes a peripheral device transmitter. Ex. 1008, Abstract, ¶17. *Kaplan* does not describe transmission to its receiver through any other means. *Kaplan* notes that “embodiments of the present invention provide a ‘walled garden’ approach” where the peripheral device transmitter is pre-paired to the receiver. *Id.*, ¶¶21, 53. *Kaplan*’s transmitter and receiver may communicate, after pairing, using a communication channel from “commercially available wireless communications standards.” *Id.*, ¶31. *Kaplan*’s pairing occurs during manufacturing. *Id.*, ¶¶14, 53, 56, Fig. 5. *Kaplan*’s system does not describe other pairing methods.

Van de Laar’s system discloses dockees that communicate with the wireless docking host via a Wi-Fi or Bluetooth communication unit. Ex. 1007, ¶76. Figure 1 illustrates that the dockee communication unit is embedded in the dockee device itself. *Id.*, Fig. 1. This is beneficial in *Van de Laar*’s ad hoc lecture context, as many users can receive shared content on their personal devices without being limited by the number of peripheral device transmitters available. Ex. 1007, ¶¶52, 110, Fig. 2.

A POSITA would recognize these differences between *Van de Laar* and *Kaplan* are designed to solve opposite constraints, and a POSITA would not be motivated to combine them. Broad allegations of “benefits” without appreciating technical differences between these systems are insufficient to render the claims

obvious. Instead, Petitioner seeks to pick and choose teachings of a reference to reconstruct the '347 Patent through improper hindsight, which should not be rewarded.

IV. EVIDENCE ESTABLISHES NON-OBVIOUSNESS OF THE INVENTION

A. The Crestron License

The Reply argues without evidentiary support that the Crestron License was entered into to avoid litigation expense and to obtain other business benefits. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Ex. 2023, 4:3–10, 9:1–6, 58:16–19. Crestron agreed to license the challenged patents without any litigation being filed or threatened. *Id.*, 58:14–19. Petition presents no evidence that the Crestron License was a strategy to avoid litigation expense. No litigation was filed and Crestron did not offer a product that competed with ClickShare until after obtaining the license. *Id.* Patent Owner never had an infringement claim because Crestron obtained a license before ever selling its desired product. *Id.* Petitioner's argument is unsupported and is an attempt to cast all patent license negotiations as a litigation cost saving strategy, and not an objective indicia of non-obviousness.

Petitioner argues that Crestron sought the license to obtain “mutual business interests” but makes no showing that these interests were anything other than the

ability to secure the necessary rights to build and sell a desired, patent practicing, product. Reply, 27 (citing Ex. 2023, 76:12–18). There are no other allegations of business interests. Through the license, Crestron could sell products that practice the patented technology and Barco obtained licensing income. That is simply how licenses work.

The Reply seeks to apply “a more exacting nexus standard than our case law requires for licensing evidence.” *Ancora Techs., Inc. v. Roku, Inc.*, 140 F.4th 1351, 1362 (Fed. Cir. 2025). “Unlike products...actual licenses to the subject patent do not demand the same, as they are, by their nature, directly tied to the patented technology.” *Id.* “[T]he 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 1363. The Reply’s argument requiring the license be apportioned is contrary to the Federal Circuit’s unequivocal *Ancora* ruling.

B. Commercial Success

Petitioner’s arguments regarding commercial success are predicated on a fundamental misunderstanding of Patent Owner’s products. First, Petitioner cites features of the ClickShare C-5. Reply, 27; Ex. 1062, ¶90 (citing Ex. 1091). The ClickShare C-5 ***does not practice*** the ’347 Patent—it is not part of the ClickShare Conference line and Patent Owner has never alleged the C-5 practices the ’347 Patent. Ex. 2017, 9–10; Ex. 2004, ¶184. The C-5 is not compatible with a camera,

which is the functional device that communicates video data in the '347 Patent Claims. Worst of all, Dr. Almeroth did not even analyze the C-5 for the purposes of this proceeding, and Petitioner's entire argument should be disregarded as unfounded. Ex. 2033, 42:4–46:2.

Second, Petitioner argues “ClickShare includes significant unclaimed features, such as Teams and Zoom integration.” Reply, 27, 29; Ex. 1062, ¶90. This ignores the fact that use of Zoom and Teams is provided *through the claimed method*. The Barco ClickShare Base Units cannot host a Zoom or Teams call themselves—these calls are hosted on a laptop using the claimed base unit peripheral device architecture. This “significant unclaimed feature” is the very features claimed by the '347 Patent. Ex. 1001, Cls. 1–31.

Dr. Almeroth supports his opinions of the '347 Patent based on his understanding of Barco's C-5 product, but admitted, at his deposition, that he did not even fully investigate the C-5's actual operations to form his opinions. Ex. 2033, 46:13–47:3, 21:7–25. As before, Dr. Almeroth provides limited independent analysis of the issues involved in these proceedings. *See* IPR2024-01436, Paper 60 (hearing transcript) at 96:10–14. Petitioner also disputes that Patent Owner's estimated gross profits are adequate to show commercial success, but the Federal Circuit has held that sales data (e.g., revenue) alone is sufficient. Reply, 28–29; *Chemours Co. FC, LLC v. Daikin Indus., Ltd.*, 4 F.4th 1370, 1378 (Fed. Cir.

2021). Like the Crestron license, the commercial sales of the patented inventions is strong objective evidence that the challenged patent is not obvious over the prior art.

V. CONCLUSION

For the reasons set forth above, the patentability of all claims of the '347 Patent should be upheld.

Dated: May 28, 2026

Respectfully submitted,

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

Certification of Word Count Under 37 C.F.R. § 42.24(d)

The undersigned hereby certifies that the foregoing contains 5,573 words according to the word count of the word-processing software used to prepare the foregoing.

By: /Erik Halverson/
Erik Halverson
Reg. No. 73,552
K&L GATES LLP

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2026, a true and correct copy of the foregoing was caused to be served on the following counsel of record for Petitioner by electronic mail at the following addresses:

Stephen Yang
stephen.yang@dentons.com
Kevin R. Greenleaf
kevin.greenleaf@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 Halverson
Reg. No. 73,552