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

MOTION TO SEAL

Exhibit List

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 *(Confidential and Redacted Versions Filed)*
Ex. 2011	Crestron License Agreement *(Confidential and Redacted Versions Filed)*
Ex. 2012	*Barco and Crestron announce patent license agreement regarding a set of essential ClickShare patents*, 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	*ClickShare conferencing & collaboration,* BARCO (April 1, 2025), https://web.archive.org/web/20250401012647/https://www.barco.com/en/products/clickshare-conferencing-collaboration#expand
Ex. 2014	*ClickShare Button*, BARCO (February 12, 2025)

Exhibit	Description
	https://web.archive.org/web/20250212164931/https://www.barco.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	*Patent*, 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 *(Confidential and Redacted Versions Filed)*
Ex. 2024	Reserved
Ex. 2025	*ClickShare CX-30*, 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, *Security Whitepaper ClickShare Conference*, BARCO (March 23, 2020)
Ex. 2027	Gary Kayye, *Here's a Detailed Look at the New Barco ClickShare Conference From the Launch Event in NYC*, 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/

Exhibit	Description
Ex. 2028	Gary Kayye, *Here's a Detailed Look at the New Barco ClickShare Conference From the Launch Event in NYC*, RAVE (January 27, 2020) 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, *ClickShare Delivers Wireless Conferencing*, 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] *Barco Debuts ClickShare Conference at Launch Event in NYC!*, 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

Patent Owner requests that the Patent Owner Sur-Reply (Paper 35) be sealed under 37 C.F.R. § 42.54. Good cause to seal this document exists because it references sensitive, nonpublic information described in sealed Exhibit 2023. A redacted version of Patent Owner's Sur-Reply is being filed herewith.

Patent Owner certifies that it has conferred with Petitioner through counsel, and Petitioner has reserved their right to oppose after reviewing the instant motion and sealed material.

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).

Patent Owner has already sought to seal Exhibit 2023 for containing the confidential business information of a Third Party that has been produced in the underlying district court action. *See* Paper 21. The Patent Owner Sur-Reply cites to and quotes from the confidential portions of Exhibit 2023.

First, the information Patent Owner seeks to seal is truly confidential. The information contained in Exhibit 2023 relate to confidential business practices, including confidential and sensitive information relating to licensing dealings between Patent Owner and third parties. The agreement itself (Exhibit 2011) is also subject to confidentiality provisions and is treated as confidential by Patent Owner in its regular business operations.

Second, Patent Owner and the third-party would suffer several concrete harms from the public disclosure of the confidential information. This information referenced from the sealed exhibits includes financial terms, including licensing terms, and sales information, which would give Patent Owner and the third party's competitors unfair competitive advantages, which would otherwise be unavailable. Moreover, knowledge of such information would put Patent Owner and the 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.). The information sought to be sealed is useful to show the secondary indicia of nonobviousness of the Challenged Patent.

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.

As previously articulated in Paper 21, the balance of the *Argentum* factors favors sealing the document at issue.

Respectfully submitted,

Dated: May 28, 2026

By: /*Erik Halverson*/

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 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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