

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLIGENT PROTECTION MANAGEMENT CORP.,
Petitioner,

v.

CISCO TECHNOLOGY, INC.,
Patent Owner

Case No. IPR2025-01589
U.S. Patent No. 8,941,708

PATENT OWNER'S DISCRETIONARY DENIAL BRIEF

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Rules

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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	DESCRIPTION
2001	News article reporting Cisco's acquisition of WebEx, retrieved from https://www.nbcnews.com/id/wbna17627369 (last visited Nov. 19, 2025)
2002	Cisco webpage giving usage statistics, retrieved from https://www.cisco.com/c/en_sg/products/conferencing/index.html (last visited Nov. 19, 2025)
2003	Complaint filed in <i>Paltalk Holdings, Inc. v. WebEx Commc'ns, Inc.</i> , No. 6:21-cv-757
2004	Aug. 26, 2024 Court Transcript from <i>Paltalk Holdings, Inc. v. WebEx Commc'ns, Inc.</i> , No. 6:21-cv-757
2005	Intelligent Protection Management Corp. SEC Form 8-K, Jan. 2, 2025, retrieved from sec.gov/Archives/edgar/data/1355839/000121390025000379/ea0226465-8k_intelli.htm (last visited Oct. 27, 2025)
2006	Complaint filed in <i>Cisco Sys., Inc. v. Intelligent Prot. Mgmt. Corp.</i> , No. 1:25-cv-271
2007	Defendant's Initial Invalidity Contentions in <i>Cisco Sys., Inc. v. Intelligent Prot. Mgmt. Corp.</i> , No. 1:25-cv-271
2008	Webex Suite webpage, retrieved from https://www.webex.com/suite/collaboration-suite.html (last visited Dec. 8, 2025)
2009	Cisco Meeting Server webpage, retrieved from https://www.cisco.com/c/en/us/products/conferencing/meeting-server/index.html (last visited Dec. 8, 2025)
2010	Cisco RoomOS webpage, retrieved from https://www.webex.com/us/en/solutions/roomos.html (last visited Dec. 8, 2025)
2011	Cisco Conferencing Products webpage, retrieved from https://www.cisco.com/c/en/us/products/conferencing/product-listing.html (last visited Dec. 8, 2025)
2012	Petitioner's proposed constructions of claim terms in the district court litigation dated December 16, 2025

I. INTRODUCTION

Petitioner Intelligent Protection Management Corp.’s (“IPM” or “Petitioner”) IPR2025-01589, challenging the patentability of U.S. Patent No. 8,941,708 (“’708 Patent”), should be discretionarily denied for the combination of the following three reasons.

First, Petitioner has taken inconsistent claim construction positions between the instant IPR and the parallel district court litigation. While arguing in the instant IPR that “[n]o terms need to be construed by the Board at this time, and all should be given their ordinary meanings to the extent they are not indefinite,” (Pet. at 8), Petitioner proposed construction of eleven claim terms in the parallel district court litigation—without any explanation why the Petitioner is taking an inconsistent position between the two forums. *See* EX2012. In such cases, “that would mean a denial of institution.” *Revvo Technologies, Inc. v. Cerebrum Sensor Technologies, Inc.*, IPR2025-00632, Paper 20 at 5 (Dir. Nov. 3, 2025) (precedential).

Second, the ’708 Patent—a patent that relates to videoconferencing—issued over *eleven* years ago—a timeframe that the Director has previously found to favor discretionary denial based on settled expectations. *See, e.g., Toyota Motor Corporation v. AutoConnect Holdings LLC*, IPR2025-00890, Paper 9 at 2 (Dir. Sept. 19, 2025) (“the challenged patents have been in force for more than eleven years,

creating strong settled expectations for Patent Owner”). Moreover, Petitioner was aware Patent Owner owned numerous patents related to videoconferencing long before the petition was filed because Petitioner sued Cisco back in 2021 alleging that Cisco’s Webex video conferencing software infringes its own patents. *See* EX2003. Director has previously held that “[a] failure to seek early review of the patent favors denial” when “Petitioner was aware that Patent Owner was involved in the same technology space for a significant amount of time before filing its Petition.” *Murata Manufacturing Co., Ltd, v. Georgia Tech Research Corp.*, IPR2025-00383, Paper 14 at 2 (PTAB Jul. 29, 2025).

Finally, the duplication of efforts between this IPR Petition and the co-pending district court litigation additionally favors discretionary denial. Petitioner served Cisco with invalidity contentions that rely on not only similar grounds as those presented in the Petition, but on at least twelve additional Grounds not present in the instant Petition. Despite the overlap, Petitioner has not filed any kind of stipulation that could even remotely mitigate the duplication of efforts. The inefficiency introduced and deliberately maintained by the Petitioner favors discretionary denial.

II. FACTUAL BACKGROUND

A. The '708 Patent

The '708 Patent was filed on July 27, 2012 and issued on January 27, 2015. EX1001 at Cover. The '708 Patent is directed to a method of user input for changing between predefined video layouts, such as in a videoconferencing call, by dragging an object between points on an axis. EX1001 at 3:58–4:23. The layout options are predefined, such as in an XML file:

```
<video>
  <layout>
    <frame item=1>
      <PositionX>10000</PositionX>
      <PositionY>10000</PositionY>
      <Width>4084</Width>
      <Height>4084</Height>
      <VideoSourceId>1</VideoSourceId>
    <frame item=2>
      <PositionX>5000</PositionX>
      <PositionY>5000</PositionY>
      <Width>4084</Width>
      <Height>4084</Height>
      <VideoSourceId>2</VideoSourceId>
```

EX1001 at 3:29-42. The '708 Patent provides a convenient tool for switching between them by associating those layouts with points on an axis. EX1001 at 2:52-56. A user can then change layouts by moving a control element along that axis. EX1001 at 3:64-4:2.

B. Factual Background

Cisco has been operating in the video conferencing technology space for nearly two decades. *See* EX2001 (describing Cisco's 2007 acquisition of online

videoconference platform, Webex). Cisco markets numerous videoconferencing products, such as Webex Suite, Cisco Meeting Server, Webex RoomOS, and much more. *See* EX2008-2011. Cisco's Webex platform hosts over 500 million video calls each year. *See* EX2002 at 4.

Petitioner IPM, formerly known as Paltalk Holdings, Inc.¹, sued Cisco in 2021, alleging that Cisco's Webex software infringed one of its patents. *See* EX2003. And Petitioner was well aware that Cisco holds patents in the very same videoconferencing technology space. EX2004 at 51:19-23 ("Cisco's history of innovation is perhaps best showed most clearly by the fact that it has 14,000 issued U.S. patents of its own. As you'll hear, more than 700 of those patents relate to Webex.").

Cisco filed suit against IPM in 2025, asserting two of Cisco's videoconferencing patents—one of which is the '708 Patent—against IPM's ManyCam software. *See Cisco Systems, Inc. v. Intelligent Protection Management Corp.*, No. 1:25-cv-00271 (D. Del. Mar. 7, 2025). Nearly eight months after Cisco filed suit, IPM filed this Petition, raising five Grounds of unpatentability based on

¹ In 2024, Petitioner "change[d] its corporate name from 'Paltalk, Inc.' to 'Intelligent Protection Management Corp.'" *See* EX2005.

various combinations of five prior art references. Pet. at 2. On December 16, 2025, nearly two months after this Petition was filed, IPM served Cisco with a chart that identified eleven claim terms along with their proposed constructions. *See* EX2012. However, the Petition asserted that “[n]o claim terms need to be construed by the Board at this time, and all should be given their ordinary meanings to the extent they are not indefinite.” Pet. at 8.

III. PETITIONER’S GAMESMANSHIP WARRANTS DISCRETIONARY DENIAL

A. Director Requires Petitioner To, At A Minimum, Explain Why Alternative Claim Construction Positions Are Warranted

In *Revvo*, the Director *sua sponte* de-instituted a previously-instituted IPR because the petitioner simply accepted Patent Owner’s proposed construction from the parties’ district court litigation and failed to explain why *the Petitioner* was taking an inconsistent position between the district court litigation and the IPR. *See also Cambridge Mobile Telematics, Inc. v. Sfara, Inc.*, IPR2024-00952, Paper 12 at 8-9 (PTAB Dec. 13 2024) (informative); *accord Sun Pharm. Indus. Inc. v. Nivagen Pharm., Inc.*, IPR 2025-00893, Paper 18 at 3 (Dir. Sept. 19, 2025) (“Although a party is not necessarily precluded from arguing different claim construction positions before a district court and the Board, a party should explain why different positions are warranted.”). Director explained that “[a]llowing petitioners to continue this

practice does not further the Office’s goal of ‘providing greater predictability and certainty in the patent system.’ 83 Fed. Reg. at 51, 342-43.” *Revvo* at 4. In such situations, “that would mean a denial of institution.” *Id.*, at 5. The same is true here.

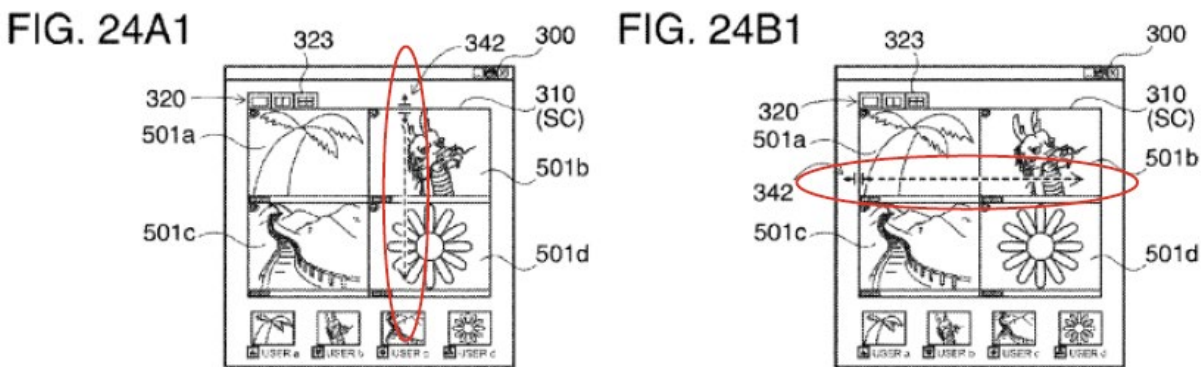
Petitioner filed the instant IPR on October 28, 2025, arguing that “[n]o terms need to be construed by the Board at this time, and all should be given their ordinary meanings to the extent they are not indefinite.” Pet. at 8. However, on December 16, 2025—less than two months after the instant IPR Petition was filed—Petitioner served Cisco with *eleven* claim terms that allegedly require construction. *See* EX2012. These terms and their proposed constructions are reproduced below:

Claims	Claim Term	Proposed Construction
All	axis	a continuous or discontinuous line, having a start value, an end value, a number of intermediate values
All	composite video signal	a video signal being a spatial mix of one or more video conference streams
All	video conference streams	multimedia streams originating from an endpoint
All	video composing unit	a device or software running on a processing device configured to receive a number, P, of video conference streams and mix the streams together into one or more composite video streams, and output the one or more composite video streams to one or more endpoints
All	layout	a template or pattern for defining the composition of a composite video signal

1, 10, 16, 17	an object configured to be moved by a user along an axis	a moveable user-interface object whose position is limited to a single axis and whose position on that axis affects composition of the composite video signal
1	associating a plurality of predefined layouts ... with respective intervals along the axis	assigning each member of the plurality of predefined layouts to a specific position or specific range of positions on an interval
1 and 17	a layout, ... associated with an interval	a layout assigned to a specific interval on the axis
10 and 16	associating a plurality of predefined layouts with respective intervals along the axis	assigning each member of the plurality of predefined layouts to a specific position or specific range of positions on the axis
10 and 16	the layout, ... associated with the interval	a layout assigned to a specific position or range of positions on the axis
17	associate a plurality of predefined layouts with respective intervals along the axis	assigning each member of the plurality of predefined layouts to a specific position or specific range of positions on the axis

Most problematic with Petitioner's proposed constructions is the fact that Petitioner is pursuing a ***broader*** construction in this Petition than that proposed in the parallel district court litigation. For example, for the term "an object configured to be moved by a user along an axis," Petitioner's proposed construction in the District Court requires "a moveable user-interface object whose position is ***limited to a single axis*** and whose position on that axis affects composition of the composite video signal." EX2012 at 5. But in Ground 4, which relies on "[t]he combination of

Kikuchi and Eleftheriadis (the ‘KE Combination’),” the Petition argues that “the KE Combination would include a display on which a user may drag the object along an axis extending across video for a plurality of video conference streams.” Pet. at 55-56. While seemingly limited to a single axis, Petitioner, in the very next limitation, argues that the slider can move along not only the “horizontal axis” (e.g., as shown in FIG. 24B1 below), **but also** along the “vertical axis” (e.g., as shown in FIG. 24A1). See Pet. at 56; see also *id.*, at 13-16.



Pet. at 16. Kikuchi’s slider that moves along **multiple (i.e., vertical and horizontal)** axes does not meet the “**limited to a single axis**” portion of the proposed construction from the District Court. This is simply gamesmanship by the Petitioner and should be discouraged. See *Revvo* at 4 (“[T]he rules discourage petitioners from seeking broader constructions at the Board to support a patentability challenge while seeking narrower constructions in litigation to avoid infringement liability.”).

The problems do not end there. None of these proposed constructions are

discussed in any detail in the Petition. For example, for the term “*axis*,” which allegedly requires “a *continuous or discontinuous* line, *having a start value, an end value, a number of intermediate values*,” (EX2012 at 4) the Petition merely argues that “the ‘line’ in Mahemoff would correspond to the ‘axis’”—without any explanation as to whether that “line” in Mahemoff is “continuous or discontinuous” or where the “start value,” the “end value,” or the “number of intermediate values” are located in Mahemoff’s “line.” *See* Pet. at 22.

As another example, for the term “*composite video signal*,” which allegedly requires “a video signal being a *spatial mix* of one or more video conference streams,” the Petition merely argues that this claim term is met because “the EM Combination would ... compose a composite video signal based on the associated layout from a plurality of predefined layouts, such as a layout associated with a discrete number of views in defined intervals are selected, as in FIGs. 10-12 of Eleftheriadis”—without any explanation as to whether those predefined layouts are a “*spatial mix*” of one or more video conference streams. *See* Pet. at 28-31. This deficiency is further compounded by the fact that Petitioner proposed a construction for “*video conference streams*” to mean “multimedia streams *originating from an endpoint*” and Petitioner again failed to articulate whether any of the alleged multimedia streams originated from an endpoint or not.

This is even further compounded by the fact that for nearly identical claim terms, Petitioner is proposing two different constructions in the district court litigation:

Claims	Claim Term	Proposed Construction
1 and 17	<u>a</u> layout, ... associated with an interval	a layout assigned to a <i>specific interval</i> on the axis
10 and 16	<u>the</u> layout, ... associated with the interval	a layout assigned to a <i>specific position or range of positions</i> on the axis

Yet, in the Petition, there is simply no discussion as to how these two claim terms meet their respective proposed constructions. Indeed, for “the layout, ... associated with the interval” limitation found in [10.e], the Petition merely refers back to “element [1.d]” that dealt with “a layout, ... associated with the interval” without any further explanation. This is particularly problematic because even if the “*specific interval*” portion of the proposed construction was demonstrated in [1.d]—which, to be clear, Petitioner has *not* demonstrated—the Petition in [10.e] fails to articulate how the “*specific position or range of position*” in its proposed construction for “the layout ...” is met or how it may or may not be related to the “*specific interval*” found in its proposed construction for “a layout” of element [1.d].

Finally, even if these proposed constructions are somehow met—albeit buried in the Petition’s analysis somewhere—it is the Petitioner’s burden to clearly and

succinctly communicate the arguments it wishes to make to the Board and the Patent Owner. Asking the Board and Patent Owner to “play archaeologist” with the record is improper and the Petition should be discretionary denied for this reason alone. *See U.S. Well Services, LLC v. Halliburton Energy Services, Inc.*, IPR2022-01163, Paper 9 at 16-17 (PTAB Dec. 20, 2022) (“The layering of one alternative argument on top of another alternative argument, without sufficient explanation of how the alternatives interrelate, obscures what exactly Petitioner is relying on as disclosing the limitations of the claims challenged under this ground. In addition, this approach improperly shifts the burden of deciphering Petitioner’s arguments onto Patent Owner and the Board, which is contrary to the statutory and regulatory provisions governing *inter partes* review proceedings discussed above. To hold otherwise would require us to ‘play archaeologist with the record,’ which we decline to do.”); *see also DeSilva v. DiLeonardi*, 181 F.3d 865, 866-67 (7th Cir. 1999) (“A brief must make all arguments accessible to the judges, rather than ask them to play archaeologist with the record.”); *see also In re Baxter Travenol Lab’ys*, 952 F.2d 388, 391 (Fed. Cir. 1991) (“It is not the function of this court to examine the claims in greater detail than argued by an appellant....”).

IV. SETTLED EXPECTATIONS WARRANT DISCRETIONARY DENIAL

A. Director Has Repeatedly Discretionarily Denied Petitions When The Patent Has Issued More Than Ten Years Ago

The Director has repeatedly discretionarily denied IPR petitions if the challenged patent was issued more than a decade ago. *See, e.g., Toyota Motor Corp. v. AutoConnect Holdings LLC* IPR2025-00890, Paper 9 at 2 (“the challenged patents have been in force for approximately eleven and ten years, respectively, creating strong settled expectations for Patent Owner”); *Intel Corp. v. General Video, LLC*, IPR2025-01036, Paper 13 at 3 (Dir. Oct. 17, 2025) (finding settled expectations for patents after ten and seventeen years); *United Microelectronics Corp. v. Advanced Integrated Circuit Process LLC*, IPR2025-01053, Paper 11 at 2 (Dir. Oct. 10, 2025) (finding settled expectations after ten, eleven, twelve, and thirteen years). ***The '708 Patent issued nearly eleven years ago.***

B. Director Has Also Discretionarily Denied Petitions When The Petitioner Was Previously Aware Of Patent Owner's Patent Rights

In addition, the Director has discretionarily denied IPR petitions if the Petitioner was aware of Patent Owner's involvement in the same technology space long before the IPR petition was filed, particularly, as here, when the patent was in force for about eleven years. *See Murata*, IPR2025-00383, Paper 14 at 2 (finding that settled expectations warranted denial, in part because “Petitioner was aware that

Patent Owner was involved in the same technology space for a significant amount of time before filing its Petition”). Here, Petitioner sued Cisco over four years ago in 2021 over the very same videoconferencing technology space. *See* EX2003. Indeed, in that lawsuit, Cisco notified Petitioner that it holds numerous patents in the video technology space. *See* EX2004 at 51 (“Cisco’s history of innovation is perhaps best showed most clearly by the fact that it has 14,000 issued U.S. patents of its own. As you’ll hear, more than 700 of those patents relate to Webex.”).

The Director’s prior decisions have found such facts to be sufficient to deny institution based on settled expectations. Moreover, the Petition’s lack of compelling merits further warrants discretionarily denying institution.

V. PARALLEL DISTRICT COURT LITIGATION FAVORS DENIAL

There is yet a third, further compounding factor that favors discretionary denial. When a parallel district court proceeding involves the same patent and the same parties, “concerns of inefficiency and the possibility of conflicting decisions” favor denial. This is particularly true when there is substantial overlap between the Ground, arguments, and evidence presented to each tribunal. *See Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11 at 12 (PTAB Mar. 20, 2020) (precedential). Here, the Petitioner relies on largely overlapping grounds, evidence, and arguments to attack the same claims as it does in the District Court. And Petitioner does so

without any stipulation to forego the second bite at the invalidity apple in the District Court.

In the parallel district court litigation, Petitioner served Cisco with proposed terms for construction. *See* EX2012. Petitioner also served Cisco with initial invalidity contentions alleging that the same challenged claims of the Petition are invalid in light of the same Eleftheriadis reference that is asserted in every ground here, and in light of Kikuchi that is also asserted here against every claim. EX2007 at 7, 9-10. Of the five references asserted here, three of them are asserted in the district court litigation as independently sufficient to invalidate. *Id.* That is not all. Petitioner is pursuing at least twelve additional §§ 102 and 103 invalidity grounds in the District Court based on four other patents and/or printed publications not included in this IPR. EX2007 at 7-19. So, while Petitioner's invalidity grounds presented here are almost entirely comprehended by its theories in the District Court, only a fraction of its arguments in the District Court are presented here in the Petition.

Despite the substantial duplicative efforts between the two forums, Petitioner has not offered any kind of stipulation whatsoever. *See Phison Electronics Corporation v. Vervain, LLC*, IPR2025-00213, Paper 14 at 3 (Dir. July 10, 2025); *Charter Communications, Inc. v. Iarnach Technologies Ltd.*, IPR2025-00473, Paper

14 at 2 (Dir. July 16, 2025) (“The absence of such a stipulation tips the balance in favor of discretionary denial.”); *see also* Revision to Rules of Practice Before the Patent Trial and Appeal Board, 90 Fed. Reg. 48338, 4834 (proposed Oct. 17, 2025) (to be codified at 37 C.F.R. § 42). Petitioner’s decision to forego such a stipulation—despite the substantial duplicative efforts that would occur—further favors discretionary denial.

VI. CONCLUSION

For the reasons discussed above, Patent Owner Cisco respectfully requests that the Director exercise his discretion to deny institution.

Dated: December 9, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a complete copy of Patent Owner's Discretionary Denial Brief and corresponding exhibits were caused to be served on counsel of record for the Petitioner by filing this document through PTACTS and by sending this document via electronic mail to the following addresses:

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