

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZOOM COMMUNICATIONS, INC.,
Petitioner

v.

RICOH COMPANY, LTD.,
Patent Owner

Case IPR2026-00407
Patent No. 10,904,487

**PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL OF INSTITUTION**

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PATENT OWNER'S EXHIBIT LIST

Exhibit	Shorthand	Description
2001		U.S. Patent No. 9,699,411
2002		U.S. Patent No. 10,397,520
2003		Plaintiff Ricoh Company Ltd.'s Original Complaint for Patent Infringement [Dkt. 1], <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , No. 1:25-cv-01095-JCG (D. Del.), dated August 29, 2025
2004		District Court's Opinion and Order Denying Defendant Zoom Communication, Inc.'s Motion to Dismiss [Dkt. 39] <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , No. 1:25-cv-01095-JCG (D. Del.), dated May 1, 2026
2005		Prosecution History of U.S. Patent No. 11,330,026 assigned to Zoom Communications Inc.
2006		Prosecution History of U.S. Patent No. 11,785,063 assigned to Zoom Communications Inc.
2007		Prosecution History of U.S. Patent No. 11,824,671 assigned to Zoom Communications Inc.
2008		Prosecution History of U.S. Patent No. 11,863,333 assigned to Zoom Communications Inc.
2009		Prosecution History of U.S. Patent No. 12,452,323 assigned to Zoom Communications Inc.
2010		Docket Navigator listing of docket entries for <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , DDE-1-25-cv-01095 (accessed August 25, 2026).
2011		<i>Ddrops Co. v. MOM Enters., LLC</i> , C.A. No. 1:22-cv-00332-GBW, D.I. 108 (D. Del. Aug. 25, 2023) (oral order)
2012		Scheduling Order [Dkt. 53], <i>Ricoh Company, Ltd. v. Zoom Communications, Inc.</i> , No. 1:25-cv-01095-JCG (D. Del.), dated August June 15, 2026.

Patent Owner respectfully requests discretionary denial.

First, Patent Owner has strong settled expectations in the '487 Patent. The '487 Patent issued January 26, 2021, meaning it will have been in force for six years by the time of an institution decision. The '487 Patent is the third in a chain of continuations with parents on similar virtual whiteboard-videoconferencing subject matter that issued in 2019 and 2017, respectively. Indeed, Petitioner has been aware of this patent family since at least December 2021 when one of the parents was cited to reject claims in one of Petitioner's patent applications. In 2022, the parent patents were also cited by the Office and Petitioner in several others of its applications. Petitioner thus knew of this patent family for nearly five years before its petition.

Second, Petitioner had ample opportunity to timely challenge the '487 Patent, but chose delay. Petitioner was notified in writing of its infringement of the '487 Patent over two years before filing the instant Petition, which came roughly eleven months after Petitioner was served with Patent Owner's Complaint. Rather than prepare and file its petition promptly after *either* of these events, Petitioner first asked the district court to invalidate all claims as patent ineligible. Only after the Court denied Petitioner's § 101 challenge in a detailed, 58-page opinion did Petitioner turn to the PTAB. And still, even after a further two-month delay, Petitioner does so without a stipulation to avoid duplication or inconsistency.

Petitioner's gamesmanship and delay should not be rewarded with institution.

I. SUMMARY OF PERTINENT FACTS

The '487 Patent issued from an application that first published October 31, 2019 as US 2019/0335143 A1. *See* EX1001, 1/17 (§(65) Prior Publication Data). The '487 Patent claims priority to two earlier patent applications which issued in 2019 and 2017, respectively. *See id.*, 1-2/17 ((§63) Related Application Data); EX2002; EX2001. The '487 Patent itself issued January 26, 2021. EX1001.

On April 11, 2024, Patent Owner notified Petitioner of the '487 Patent and its relevance to Petitioner's products, services, and software. EX2003, 9.

On August 29, 2025, Patent Owner sued Petitioner for infringement of seven patents, including the '487 Patent. EX2003, 4, 65.

Petitioner moved to dismiss, asking the Court to invalidate all asserted patents, including the '487 Patent, under 35 U.S.C. § 101. EX2004, 4-5. Patent Owner responded by amending its complaint. EX2010, 3.

Petitioner then renewed its motion to dismiss, again asking the Court to invalidate the asserted patents under § 101. EX2004, 5. After full briefing, on April 1, 2026, the Court conducted oral argument. EX2010, 3-4.

On May 1, 2026, the Court denied Petitioner's Motion with a detailed, 58-page opinion analyzing the asserted patents, representative claims, and their respective improvements over conventional technology. EX2004, 2, 9-57.

On July 1, 2026, Petitioner filed its IPR Petition against the '487 Patent.

II. STRONG SETTLED EXPECTATIONS FAVOR DENIAL

A. At institution, the '487 Patent will have been in force for six years

Patent Owner has strong settled expectations of its rights in the '487 Patent. The '487 Patent issued in January of 2021 and, at the time an institution decision is expected in January 2027, will have been in force for six years. *See* EX1001, 1/17. The Board has routinely held that patents in force for six years have “strong settled expectations.” *Kahoot! AS v. Interstellar Inc.*, IPR2025-00696, Paper 12 at 2 (P.T.A.B. July 31, 2025) (patent “in force for over six years” creates strong settled expectations); *Amgen Inc. v. Bristol-Myers Squibb Co.*, IPR2025-00601, Paper 9 at 3 (P.T.A.B. July 24, 2025) (patent in force for six years creates strong settled expectations). Absent persuasive reasoning from a petitioner, it is not an appropriate use of resources to review a patent in which a patent owner has developed settled expectations. *Dabico Airport Sols. Inc. v. AXA Power ApS*, IPR2025-00408, Paper 21 at 2-3 (P.T.A.B. June 18, 2025) (Director Review) (informative). Petitioner provides no such persuasive reasoning here.

B. The claims as issued will have been public for over seven years

The strength of Patent Owner’s settled expectations is further underscored by the extensive public notice of the '487 Patent and its patent family. The Director has explained that settled expectations rest on constructive, not actual, notice. *Id.*, 3 (“actual notice of a patent or of possible infringement is not necessary to create settled expectations”). Here, public notice of the '487 Patent extends well over six

years. U.S. Patent Publication No. 2019/0335143 A1 (the '143 Publication), which issued as the '487 Patent, was published in October of 2019—6 years and 9 months before the filing of this Petition. EX1002, 58 (Notice of Publication). As this application was publicly available, it “provide[d] notice to the public” *See Dabico*, IPR2025-00408, Paper 21 at 3. Notably, when the '143 Publication published, the pending claims had been amended to be essentially identical to those issued in the '487 Patent. *Compare* EX1002, 50-53 (claims at preliminary amendment) *with* EX1001, 16-17 (patented claims); *see also* EX1002, 61-91 (amending only dependent claim 15 to fix typographical error during prosecution). While not in the '143 Publication itself, these identical claims were publicly available via Public PAIR (now Patent Center), such that Petitioner will have had constructive notice of the claims of the '487 Patent for over seven years by the time of institution.

C. Publication of the '487 Patent's family dates back to 2017

The '487 Patent is the third in a continuation-only series of three patents. The parent patents—issued in 2017 and 2019, respectively—have not been challenged. As such, Patent Owner's expectations around this technology are well-settled for this patent family. *See Samsung Elecs. Co. & Samsung Elecs. Am., Inc. v. GenghisComm Holdings, LLC*, IPR2025-00780, -781, Paper 11 at 2 (P.T.A.B. Aug. 22, 2025) (Acting Dir. Review) and *Samsung Elecs. Co. & Samsung Elecs. Am., Inc. v. GenghisComm Holdings, LLC*, IPR2025-00792, -793, Paper 12 at 2 (P.T.A.B.

Aug. 22, 2025) (Acting Dir. Review) (finding “strong settled expectations for Patent Owner” in patents in force for as little as three years because “essentially the same discretionary considerations” that existed for co-owned patents “in force for approximately eight and six years” also existed with respect to the younger patents).

The ’487 Patent is a continuation of U.S. Patent No. 10,397,520 (the ’520 Patent), which is a continuation of U.S. Patent No. 9,699,411 (the ’411 Patent) (collectively, the “Parent Patents”). The ’411 Patent issued in July 2017 (9 years ago) and the ’520 Patent issued in August 2019 (7 years ago). EX1001, 1-2 (§(63) Related U.S. Application Data); EX2001, 1/18; EX2002, 1/18. In addition to sharing priority, the claims of the ’487 Patent also recite subject matter that is related to that claimed in the ’520 Patent and the ’411 Patent. *See* EX1001, 10:62-11:15 (claiming a display, interface, and processors related to “a video conference session [that] is overlaid on the interactive whiteboard session window”); EX2001, 10:32-60 (claiming a display, interface, and processors related to “a videoconferencing session [that] is overlaid on top of the interactive whiteboard content area”); EX2002, 10:38-60 (claiming a “videoconferencing session [that] is arranged within the interactive whiteboard session”).

Given the related subject matter and considerably longer tenure of the Parent Patents, which remain unchallenged, Patent Owner has “strong settled expectations” in this entire patent family, of which the ’487 Patent is just one part.

D. Petitioner had actual notice of the '487 Patent's family

In addition to the wealth of constructive notice, Petitioner (Zoom) had repeated, *actual* notice of both Parent Patents within months of the '487 Patent being issued. *See e.g.*, EX2003, 9. First, the parent '520 Patent was cited in an office action in December 2021 to reject the claims of an application owned solely by Petitioner. EX2005, 102, 106 (Office citing '520 Patent in office action rejection), 229 (application owned by Zoom). The use of the '520 Patent in a bona fide Office Action rejection is sufficient to provide actual notice to Petitioner. *Cf. JinkoSolar Co. v. LONGi Green Energy Tech. Co.*, IPR2025-00859, Paper 10 at 3 (P.T.A.B. Sept. 3, 2025) (denying institution and noting that “Petitioner has been aware of the published application ... when the application was listed on a search report during prosecution of one of Petitioner’s Chinese patent applications.”).

Second, the parent '411 Patent was also cited—both by the Office and by Petitioner, itself—in *several* of Petitioner’s patent applications in 2022. EX2006, 75-77, 80 (Office citing '411 Patent in Office Action and search results of Zoom application); EX2007, 311-314 (same for different Zoom application); EX2008, 317 (*Petitioner* citing '411 Patent in IDS of Zoom application); EX2009, 466 (same for different Zoom application).

Thus, by 2022, Petitioner had repeatedly received *actual* notice of both Parent Patents shortly after the '487 Patent issued. Petitioner thus actually knew of at least

the two Parent Patents for over four years before filing its Petition, which supports denial under 35 U.S.C. § 314(a). *Cf. Belden Inc. & PPC Broadband, Inc. v. CommScope, Inc. of N.C.*, IPR2025-00833, Paper 13 at 2 (P.T.A.B. Sept. 12, 2025) (Acting Dir. Review) (denying institution where “Petitioner has been aware of the challenged patent since *at least 2022*” by citing the challenged patent in an IDS).

III. PETITIONER’S ACTIONS FAVOR DENIAL

A. Petitioner’s strategic delay favors denial

Petitioner filed its Petition: *nine years* after the parent ’411 Patent issued (EX2001), nearly *seven years* after the parent ’520 Patent issued (EX2002), over *five years* after the ’487 Patent issued (EX1001), over *four years* after Petitioner received actual notice of both Parent Patents (*see supra*, § II.D), over *two years* after Petitioner received written notice of its infringement of the ’487 Patent (EX2003, 9), nearly *eleven months* after Petitioner was sued for infringing the ’487 Patent (EX2010, 1), and *two months* after the district court denied Petitioner’s § 101 challenge (EX2010, 4). Petitioner could have filed an IPR petition at any of multiple points along that timeline, for example, within a reasonable time after receiving the April 2024 letter from Patent Owner identifying the relevance of the ’487 Patent to Petitioner’s own products. But Petitioner waited.

“The purpose of AIA reviews was, and is, to provide a quick and cost-effective *alternative* to district court patent litigation for resolving disputes over

patent validity.” *See Magnolia Med. Techs.. v. Kurin, Inc.*, IPR2026-00097, Paper 17, 2 (P.T.A.B. May 14, 2026) (Precedential). Petitioner’s actions deprived the PTAB of any chance of realizing that purpose here.

Petitioner did not seek *inter partes* review as a quick and cost-effective alternative for resolving this dispute. Petitioner instead elected to delay filing—creating unnecessary risks of overlap with the district court—until the last possible moment. Indeed, Petitioner first asked the district court to invalidate the patent, and only after being disappointed by the Court’s refusal to do so (and a further two month delay) did Petitioner look to the PTAB for a different answer. Petitioner here seeks IPR “as a means by which the petitioner presents additional invalidity arguments under sections 102 and 103” and to force “the parties [to] spend more time and resources litigating patent validity than they would have in the absence of AIA review.” *Magnolia Med. Techs.*, IPR2026-00097, Paper 17 at 3. While not expressly prohibited, that strategy—of delay, wait-and-see, and then use the PTAB for a second bite at the apple that increases “time and resources”—is antithetical to the policy goals articulated in *Magnolia Medical Technologies*.

B. Petitioner’s failure to avoid overlap and inconsistency favors denial

Petitioner offers nothing to avoid the overlap and risk of inconsistent rulings inherent in the timing of its Petition. To start, Petitioner provides no stipulation to avoid the inevitable overlap between the Board and the District Court. *Phison Elecs.*

Corp. v. Vervain, LLC, IPR2025-00213, Paper 14 at 3 (P.T.A.B. July 10, 2025) (Director Review) (“The absence of such a stipulation tips the balance in favor of discretionary denial.”); *Charter Commc'ns, Inc. v. Iarnach Techs. Ltd.*, IPR2025-00473, Paper 14 at 2 (P.T.A.B. July 16, 2025) (Director Review) (same); *DataDome S.A. v. Arkose Labs Holdings, Inc.*, IPR2025-00693, Paper 13, at 3 (P.T.A.B. Aug. 14, 2025) (Director Review) (no stipulation “weighs in favor of discretionary denial”). By foregoing any stipulation, Petitioner shows that it will continue to fight patent validity at the district court. Thus, this Petition is clearly being used as an “*addition* to, not an *alternative* to, the litigation”—inconsistent with the purpose of AIA reviews. *Magnolia Med. Techs.*, IPR2026-00097, Paper 17 at 3-4.

Moreover, Petitioner has not sought a stay or asserted that it will do so. Even so, a stay is highly unlikely before institution (the '487 Patent is one of seven patents Petitioner challenges via IPR Petitions, the last of which would not be instituted before March of 2027). *See Omni MedSci., Inc. v. Whoop, Inc.*, No. 25-140, 2025 U.S. Dist. LEXIS 264946, at *6-7 (D. Del. Dec. 23, 2025) (“The general rule . . . is . . . that stays are almost never granted before [IPR] review is instituted.”) (citation omitted); *Ddrops Co. v. MOM Enters., LLC*, C.A. No. 1:22-cv-00332-GBW, D.I. 108 (D. Del. Aug. 25, 2023) (oral order) (attached as EX2011) (“[b]ecause no institution decision has yet been issued, the Court will decline to stay the case until it hears from the PTAB.”). Further, with seven asserted patents, a complete stay of

litigation remains highly unlikely absent institution of IPRs against *all seven* asserted patents. *Siemens Indus., Inc. v. Westinghouse Air Brake Techs. Corp.*, No. CV 16-284-LPS, 2018 WL 3046511, at *1 (D. Del. June 20, 2018) (denying stay where IPR proceedings were instituted for 8 of 12 patents because it “may slightly simplify some portion of the issues for trial, but would not simplify the majority of the case”); *Courtesy Prods., L.L.C. v. Hamilton Beach Brands, Inc.*, No. CV 13-2012-SLR/SRF, 2015 WL 5145526, *2 (D. Del. Sept. 1, 2015) (denying stay where “IPRs instituted by the PTAB do not address all of the claims at issue, meaning that the parties’ dispute will not be fully resolved by the IPRs, regardless of the outcome”).

Petitioner’s litigation strategy also deprives the Board of options to avoid inefficiency or inconsistent positions. Petitioner’s § 101 motion forced the Court to invest substantial resources studying all seven asserted patents—including the ’487 Patent—to issue its detailed, 58-page opinion declining Petitioner’s request to invalidate their claims. *See* EX2004. The pursuit of that substantive motion at the pleading stage was certainly Petitioner’s choice to make, but it ensured Petitioner has not yet needed to take any formal claim construction or prior art positions in the litigation, or even produce invalidity contentions, as of the filing of this brief. Moreover, rather than live with the Court’s ruling on its § 101 motion, Petitioner has now asked the Court to transfer the case to the Northern District of California in search of a *third* venue in which to challenge validity. EX2010 at 4 (Dkt. 44).

Thus, through its own delay, Petitioner engineered circumstances by which—despite already having taken, and missed, a shot at validity—it can also take a shot at an IPR before having to crystallize any prior art litigation positions.

Coupled with its delayed filing strategy and previous validity challenge at the district court, Petitioner’s failure to mitigate any overlapping issues or duplicative efforts proves this Petition is the result of gamesmanship and not a true “alternative” to litigation. In addition to the parties’ and the Court’s investment of significant resources in the resolution of Petitioner’s substantive § 101 motion, by the time of institution in January 2027, the parties will have further invested significant resources in infringement contentions, invalidity contentions, substantial completion of technical document production, and exchanging claim terms for construction. EX2012, 29/30. Because Petitioner had the opportunity to seek AIA review of the ’487 Patent as an alternative to litigation yet chose not to, denial of institution under § 314(a) serves the public interest and will help deter future gamesmanship.

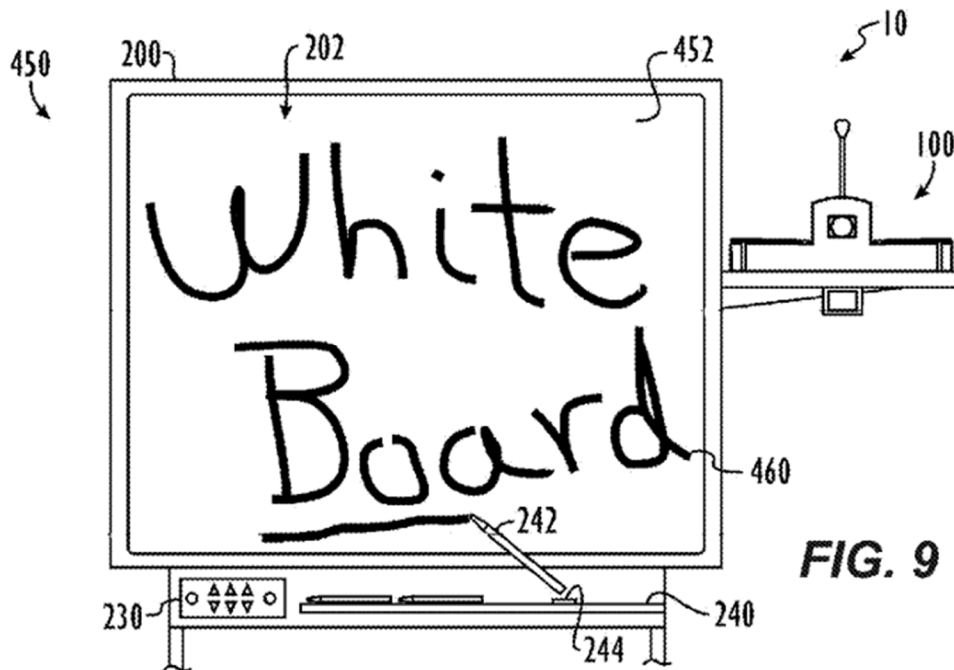
IV. PETITIONER’S WEAK CHALLENGES FAVOR DENIAL

In addition to Patent Owner’s strong settled expectations and Petitioner’s gamesmanship, the Petition’s invalidity analysis is deficient. As will be explained in more detail in the POPR, both of the Petition’s grounds fail to establish that all elements of the independent claims are disclosed or rendered obvious by the prior art. Specifically, the Petition’s analysis of **Limitations [1.f]/[8.b]/[15.b]**—which

recite “a selection menu to receive an instruction for starting a video conference session is overlaid on the interactive whiteboard session window”—is deficient for both of its proposed grounds.

A. Ground 1: Saleh Alone

For Ground 1, Petitioner relies solely on Saleh-502 (“Saleh”) for disclosing Limitation [1.f]¹ and no obviousness theory is presented for that limitation. *See* Pet., 31-32. Petitioner identifies “whiteboard content 452 [that] is displayed on the whiteboard screen 202” as shown in Saleh’s FIG. 9 (inset below) as the claimed *interactive whiteboard session window*. Pet., 30-31.



¹ The Petition treats Limitations “1.f/8.b/15.b” as identical and, thus, all deficiencies for [1.f] of claim 1 apply equal to all other independent claims (claims 8 and 15).

The Petition then identifies (1) “a control panel 230 with a button 231 configured to initiate a videoconference mode of operation” and (2) a “transparent menu 310 [that] is overlaid on the screen” as the claimed *selection menu*. Pet., 31.

As shown in FIG. 9 (above), the control panel 230 is a separate control interface mounted *outside of* the whiteboard screen 202 and, thus, cannot be “overlaid on the interactive whiteboard session window” (i.e., the whiteboard content 452) as claimed. Thus, Petitioner’s first theory must fail.

Petitioner’s second theory relies on the transparent menu 310, which is shown in FIG. 6 of Saleh (inset below). EX1004, FIG. 6; Pet., 32 (reproducing the same).

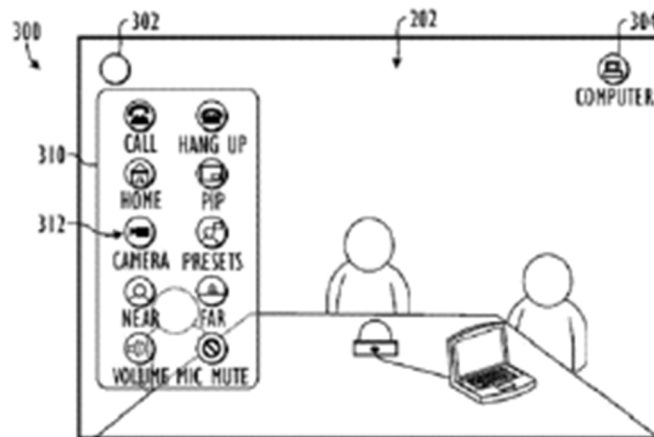


FIG. 6

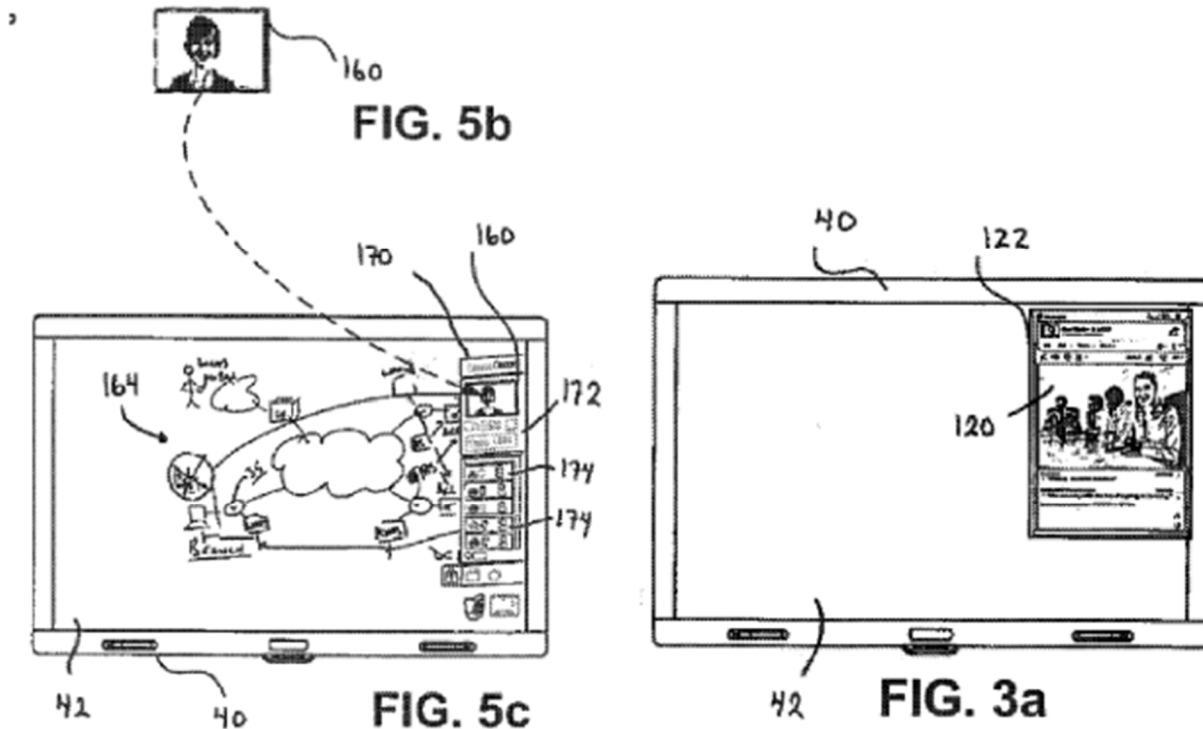
Transparent menu 310 “can be invoked when the user selects a button 302 displayed on the top left of the screen 202 while *video* is being displayed.” EX1004, 10:61-67 (emphasis added). As depicted in FIG. 6, the menu 310 is shown over a video of participants in a conference room (e.g., “while video is being displayed”). However, the whiteboard content 452 that Petitioner identifies as the claimed interactive

whiteboard session window is *not* a video feed. *See* EX1004, FIGs. 6, 9. Thus, the menu 310 appears in a different interface (displaying a video feed) than the interface used for the interactive whiteboard content. *Id.* Because Petitioner relies on separate interfaces for the selection menu and the interactive whiteboard session window, the Petition cannot show that Saleh alone discloses “a selection menu ... overlaid on the interactive whiteboard session window” as claimed.

The Petition provides no motivation or modification to combine these disparate interfaces, so its invalidity theory must fail. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989) (“The identical invention must be shown in as complete detail as is contained in the ... claim.”); *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1369 (Fed. Cir. 2008) (“[b]ecause the hallmark of anticipation is prior invention, the prior art reference—in order to anticipate under 35 U.S.C. § 102—must not only disclose all elements of the claim within the four corners of the document but must also disclose those elements ‘arranged as in the claim.’”) (citation omitted).

B. Ground 2: Gurevich and Saleh

For Ground 2, Petitioner identifies Gurevich’s interactive surface 42 of the interactive board 40 (as shown in FIGs. 3a and 5c (inset below)) as the claimed *interactive whiteboard session window*.



Pet., 62-63.

For the selection menu, the Petition cites to video stream 120 displayed on the interactive surface with “GUI elements such as selectable control elements” (FIG. 3a) and a presentation interface 170 that includes “a tool bar 172 with selectable control elements” and “icons 174 representing other participants of the conference session” (FIG. 5c). Pet., 62 (quoting EX1005, ¶¶[0053], [0057]). However, neither the video stream 120 nor the icons 174 that represent other participants meet the claimed “selection menu.”

To overcome the deficiencies of Gurevich, Petitioner provides two theories. The first theory contends that “[b]ecause the Lync video application component requires participants to join a conference session ... it would have been obvious to a

POSITA to provide a selection menu overlaid on the interactive whiteboard session window for starting a videoconference session just like the tool bar 172 overlaid on the whiteboard session window” Pet., 62 (citing solely to EX1003, ¶177). Although the Petition cites to paragraph 177 of Dr. Almeroth’s declaration for support, there is *nothing* in that paragraph to corroborate Petitioner’s assertion. *See* EX1003, ¶177 (failing to discuss “the Lync video application” or what “would have been obvious to a POSITA”). Accordingly, the Petition’s assertions about what “would have been obvious to a POSITA” are supported only by attorney argument that is insufficient to establish obviousness. *Icon Health & Fitness, Inc. v. Strava, Inc.*, 849 F.3d 1034, 1043 (Fed. Cir. 2017) (“Attorney argument is not evidence.”).

Petitioner’s second theory fares no better as it is based on the foundation that “Saleh-502 discloses” the limitation. Pet., 64. However, for the reasons explained above, Saleh fails to disclose the claimed limitation and the same deficiencies noted would likewise render Petitioner’s modification deficient. *Supra*, IV.A.

V. CONCLUSION

For the foregoing reasons, institution should be denied.

Dated: September 8, 2026

Respectfully submitted,

/Eagle H. Robinson/
Eagle H. Robinson
Reg. No. 61,361

Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on September 8, 2026, complete copies of the foregoing Patent Owner's Request for Discretionary Denial of Institution and EX2001-EX2012 were served on Petitioner via email (by consent), at the following email address(s):

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