

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 PRELIMINARY RESPONSE

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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 15, 2026.
2013		Declaration of Vijay Madisetti, Ph.D
2014		CV of Vijay Madisetti, Ph.D

I. INTRODUCTION

The Petition challenge rests on two grounds, neither of which satisfies Petitioner’s burden to establish a reasonable likelihood of success on any challenged claim. In Ground 1, Petitioner contends that Saleh-502 alone anticipates (Ground 1A) or renders obvious (Ground 1B) every challenged claim. In Ground 2, Petitioner adds Gurevich to supplement Saleh-502’s purported disclosures. Both grounds suffer from the same fatal defect: neither reference discloses or suggests “a selection menu to receive an instruction for starting a video conference session is overlaid on the interactive whiteboard session window” and “after receiving the instruction for starting the video conference session via *the selection menu* overlaid on the interactive whiteboard session window, a videoconference window to be overlaid on the interactive whiteboard session window”—the precise, ordered combination of features recited in Limitations [1.f] and [1.g] (and counterparts in claims 8 and 15).

To paper over this gap, Petitioner inconsistently maps “the instruction for starting the video conference session” to different elements/instructions of Saleh-502 depending on which limitation the Petition happens to be addressing, and then asks the Board to credit a mashup of distinct disclosures that Petitioner’s own expert concedes do not, standing alone, disclose the claimed arrangement.

Petitioner’s obviousness theories fare no better: they rely on expert testimony—not any patent or printed publication—to supply the missing claim

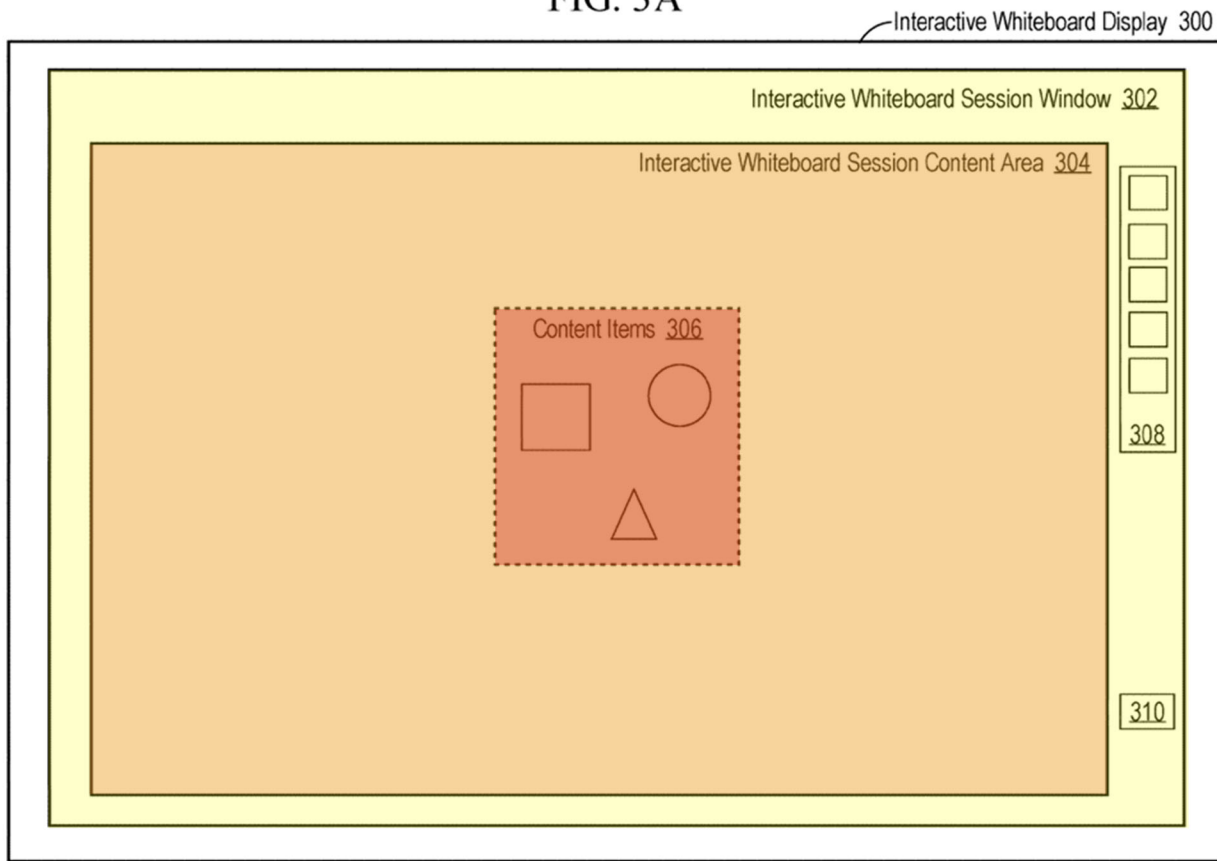
limitations, in violation of 37 C.F.R. § 42.104(b)(4) and the Office's governing guidance on the permissible use of expert testimony. Petitioner's combination of Gurevich and Saleh-502 also falls short because it would require modifying Gurevich's toolbar, which appears only after a videoconference has already been initiated, to add a control for starting a videoconference that has already started—a nonsensical modification Petitioner never adequately explains or supports with record evidence.

Institution should be denied.

II. OVERVIEW OF THE '487 PATENT

The '487 Patent is directed to an appliance that integrates and manages “interactive electronic whiteboard sessions and videoconferencing sessions between the interactive whiteboard appliance and one or more client devices.” EX1001, Abstract. An example of an interactive whiteboard display 300 that is configured to manage such whiteboard sessions and videoconferencing sessions is shown in FIG. 3A (inset below).

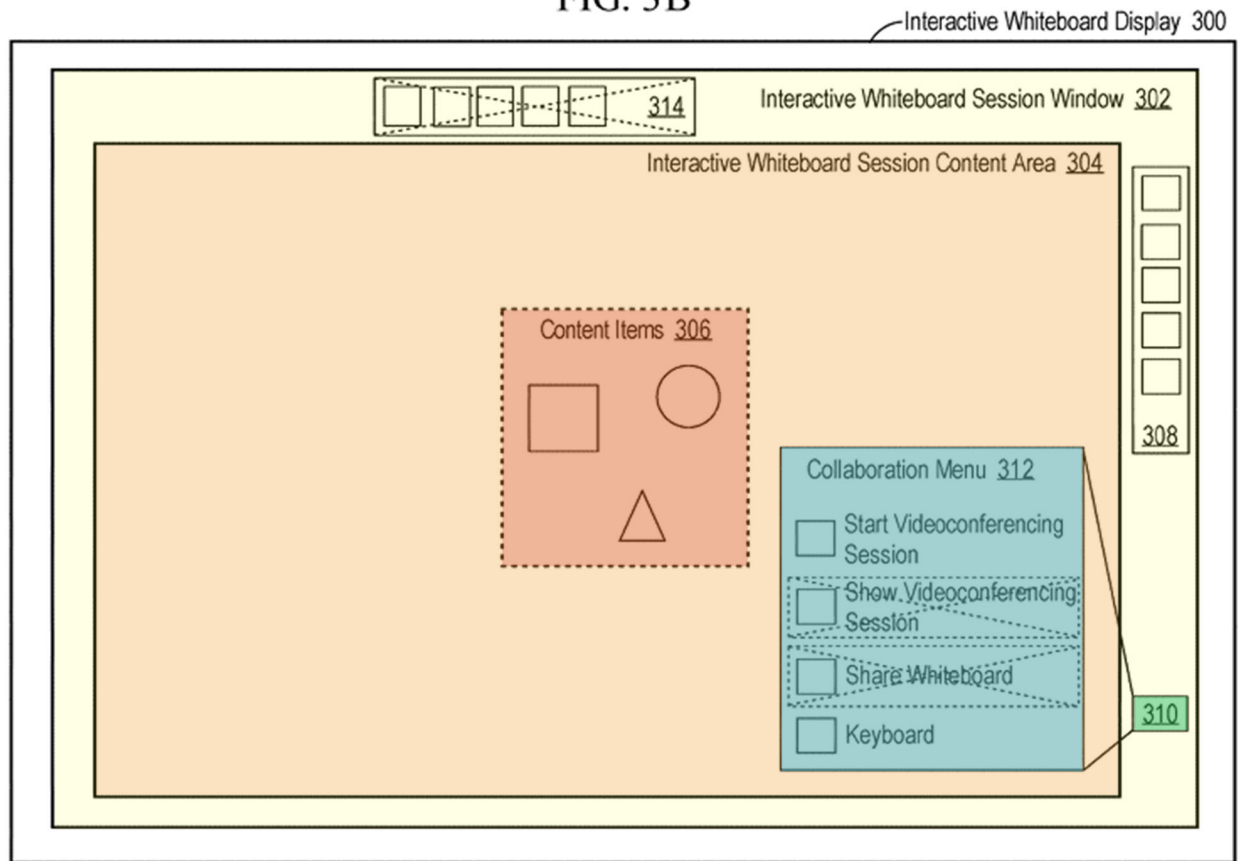
FIG. 3A



As depicted, the display “includes an interactive [yellow] whiteboard session window 302 and an interactive [orange] whiteboard session content area 304 that displays [red] content items 306.” EX1001, 6:49–52.

In the example shown in FIG. 3A, a [green] collaboration menu icon 310 can also be displayed on the whiteboard session window 302. The “selection of the collaboration menu icon 310 causes a [blue] collaboration menu 312 to be displayed,” as depicted in FIG. 3B (inset below). EX1001, 6:55–58.

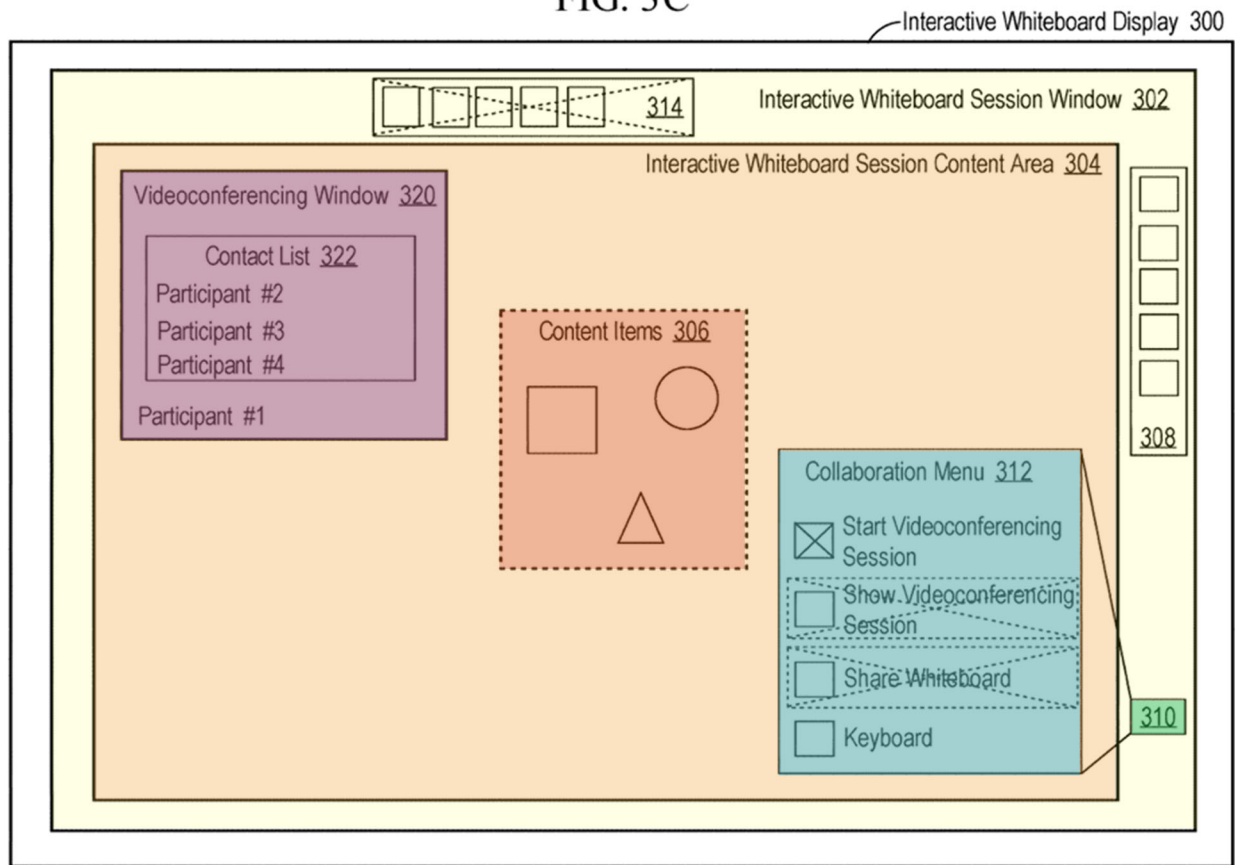
FIG. 3B



The [blue] collaboration menu 312 is overlaid on the interactive whiteboard session window 302 and “provides user access to various controls for initiating and switching between an interactive whiteboard session window and a videoconferencing session window.” EX1001, 6:58–64.

One such control in [blue] menu 312 allows a user to start a videoconferencing session. In response to user selection of the “Start Videoconferencing Session” item from the collaboration menu 312, the “application manager 128 invokes the collaboration client 126” that creates a collaboration client window that is displayed on top of the interactive whiteboard session window. EX1001, 7:15–21.

FIG. 3C



As shown above in FIG. 3C, this produces a display in which a [purple] videoconferencing session window 320 is overlaid on the whiteboard session window 302. EX1001, 7:8–22. Once the videoconferencing session is established (as also shown in FIG. 3D), [purple] “videoconferencing session window 320 is on top of and occludes much of the interactive [yellow] whiteboard session window 302,” and “the application manager 128 maintains the collaboration client 126 on top of the interactive whiteboard application.” EX1001, 7:28–34.

A. Independent Claims 1, 8, and 15

The '487 Patent contains three independent claims—claims 1, 8, and 15—that are directed, respectively, to a whiteboard device, one or more non-transitory computer-readable media, and a computer-implemented method.

Claim 1, is directed to a “whiteboard device,” and recites:

[1.a] a display;

[1.b] a network interface;

[1.c] one or more processors; and

[1.d] one or more memories communicatively coupled to the one or more processors, the one or more memories storing instructions which, when processed by the one or more processors, cause:

[1.e] an interactive whiteboard session window, including at least an interactive whiteboard session content area, to be displayed on the display, [1.f] wherein a selection menu to receive an instruction for starting a video conference session is overlaid on the interactive whiteboard session window; and

[1.g] after receiving the instruction for starting the video conference session via the selection menu overlaid on the interactive whiteboard session window, a videoconference window to be overlaid on the interactive whiteboard session window.

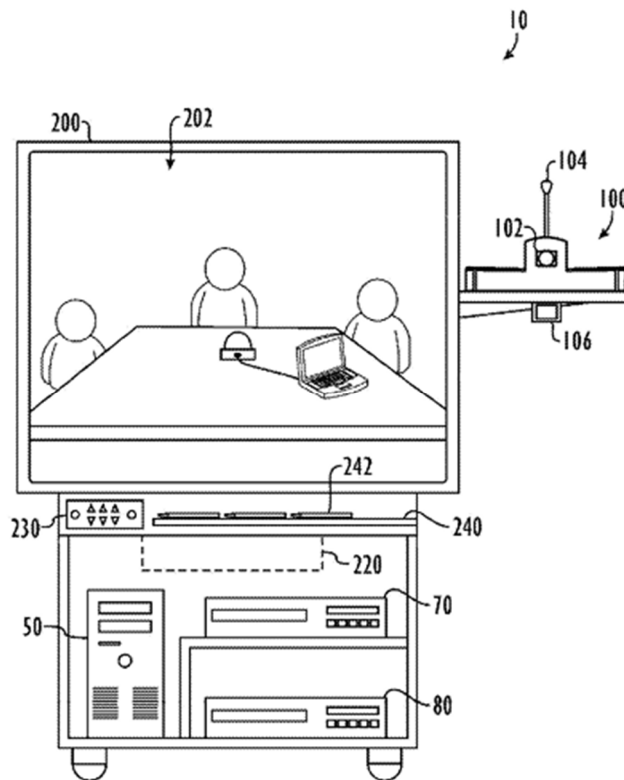
EX1001, 10:63–11:15.

Claim 8, directed to “[o]ne or more non-transitory computer-readable media,” and Claim 15, directed to “[a] computer-implemented method,” recite limitations similar to Limitations [1.d]-[1.g] of Claim 1. EX1001, 11:46–59; 12:29–41.

III. OVERVIEW OF THE PRIOR ART

A. Saleh-502 (EX1004)

Saleh-502 describes a videoconferencing system 10 that includes a videoconferencing unit 100 and a touch screen display device 200, as shown in its FIG. 2 (inset below). EX1004, 4:55-59.



The display device 200 can be operated via touch controls (e.g., from the sensor of the touch panel of device 200) or via external controls, such as a control panel 230 that includes one or more touch sensitive buttons. EX1004, 5:35-40.

Saleh-502 describes several distinct modes of operation, each associated with a different type of content presented on the display. EX1004, 8:44–10:12; EX2013, ¶37. These include “a videoconference mode of operation” in which video of remote

participants is displayed (FIG. 6); an “annotation mode” in which a user may annotate over displayed content (FIG. 8); and a “whiteboard mode” in which whiteboard content 452 is displayed on screen 202 (FIG. 9). EX1004, 8:44–10:12.

In the videoconference mode, screen 202 of the display device 200 can show a video conference that has been initiated in a full screen view. EX2013, ¶38. This videoconference mode is shown in FIG. 6, where screen 202 displays a button 302 while the video conference is being displayed in full screen. EX1004, 10:61-66; EX2013, ¶38; Pet., 32-33 (identifying FIG. 6 of Saleh-502 as depicting “the videoconference mode”).

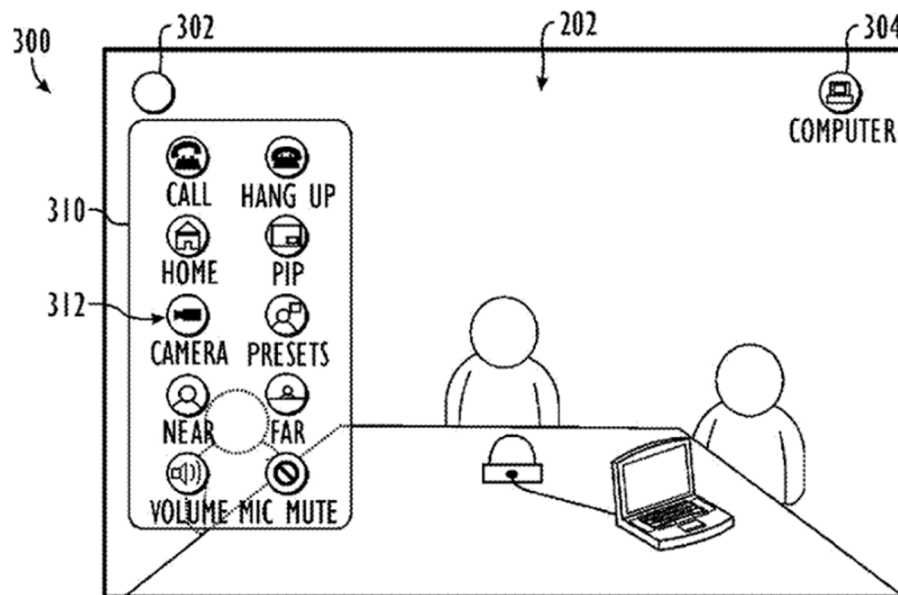
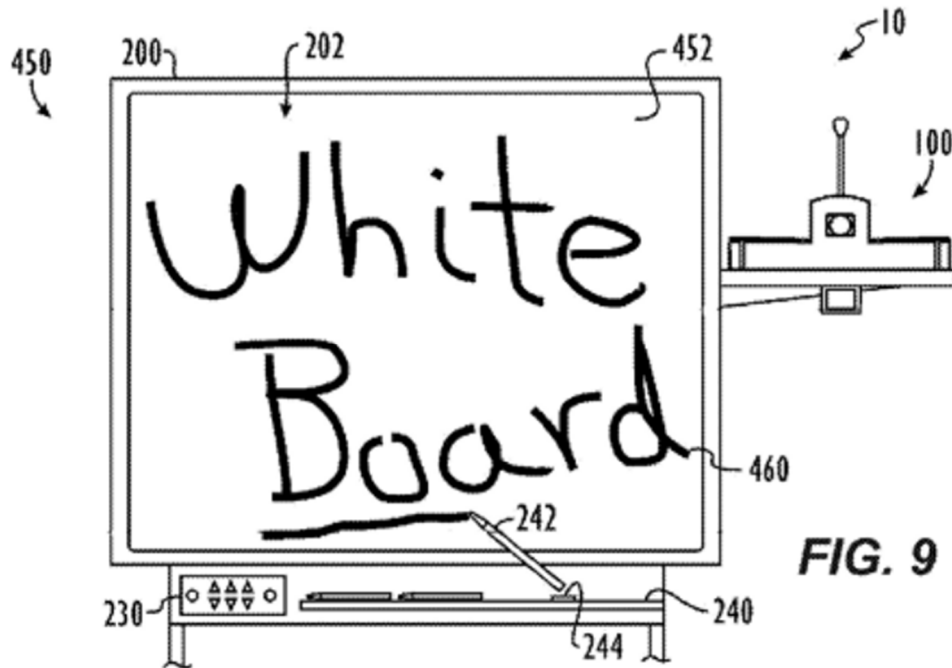


FIG. 6

In this video display interface, a menu 310 (shown above) “can be invoked when the user selects a button 302 displayed on the top left of the screen 202 while video is being displayed.” *Id.*

The videoconferencing unit can also operate in a whiteboard mode 450, shown in FIG. 9 (inset below).



“To access this [whiteboard] mode 450, a user can pick up an electronic pen 242 from the tray 240 of the display device 200 ... and the videoconferencing system 10 automatically goes into the whiteboard mode 450.” EX1004, 13:43-52. In the whiteboard mode 450, whiteboard content 452 is displayed over the existing interface on screen 202. EX2013, ¶40. For example, if a system is in the videoconference mode and displaying video data (e.g., FIG. 6) “when the user picks up the pen 242 from the tray 240,” then the system “automatically goes into the [whiteboard] mode of operation” and “generates the whiteboard content 452” to be displayed on the screen. EX2013, ¶40; EX1004, 13:64-14:3. As shown above in

FIG. 9, the “video” interface of the videoconference—along with the button and menu—are *no longer displayed* in the whiteboard mode. EX2013, ¶40.

Referring to FIG. 10, Saleh-502 further describes a separate user-interface device 500 having a touch-screen panel 502, which may be used in addition to, or instead of, touch-screen display device 200. EX1004, 15:47–16:16.

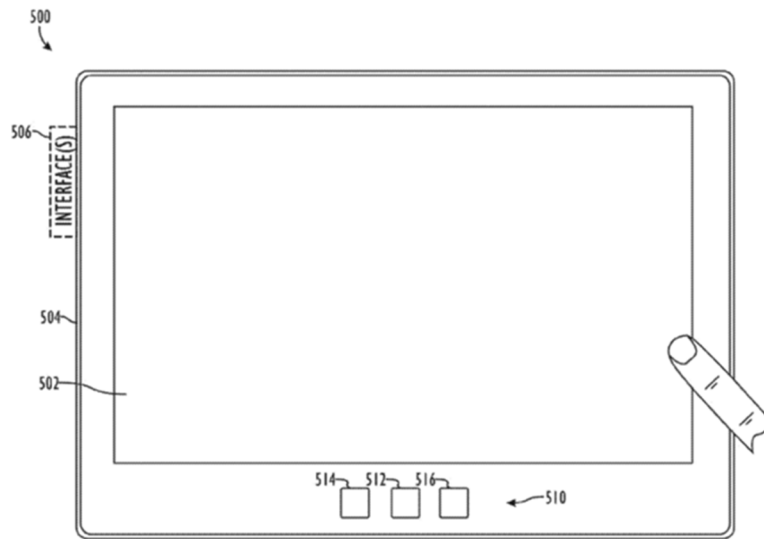
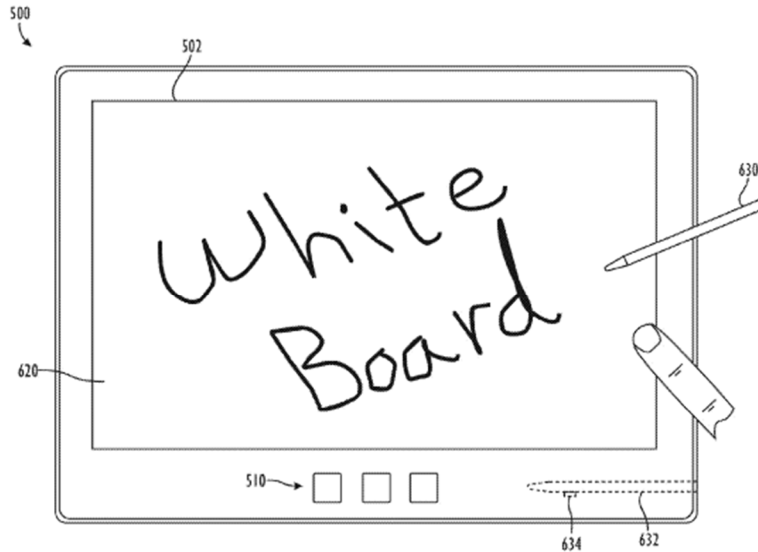


FIG. 10

Device 500 can include various menus or screens, such as those displayed in FIGs. 11A-21. For example, the touch device 500 may depict an interface showing layout control screen 580 with controls for adjusting PIP size, controlling PIP properties, removing PIP, and configuring a dual-monitor emulation mode. EX1004, 20:21–27, FIG. 18. Alternatively, the device can also operate in the “annotation/whiteboard mode” where it can display a whiteboard without any of the other menus or icons.



EX1004, FIG. 22.

B. Gurevich (EX1005)

Gurevich describes a conferencing system that attempts to solve the problem where third-party video applications (e.g., SMART Bridgit™, Microsoft® Live Meeting, Cisco® MeetingPlace, Cisco® WebEx, etc.) require video to be “displayed within its native user interface” that “do[es] not interface well” with Gurevich’s interactive display. EX1005, ¶¶[0002]-[0005], [0042]. To solve this issue, Gurevich separates video streams from their “native user interface” and re-presents the videos within a customized alternative interface. EX1005, ¶[0050].

In Gurevich a conference session is established before any video processing or display occurs. EX1005, ¶¶ [0045], [0048]-[0049]. After the conference session is established, Gurevich’s description rests on the “assum[ption] that the video stream received from remote site 26 has been selected for presentation on the

interactive surface 42 of interactive board 40.” EX1005, ¶[0052]. After the video is selected for presentation, Gurevich’s process begins by receiving an incoming video, decoding and suppressing the output of that video, separating and processing the video stream from the native interface, and then presenting the video stream in a manner better suited for the interactive board 40. EX1005, ¶[0052]. Thus, Gurevich displays the video within its improved interface only *after* a conference has been established and a user has already selected that video for presentation. EX2013, ¶47.

Gurevich provides an example of this improved presentation in which “the video streams are presented in a horizontal video strip 202 within a presentation interface 200” with a “tool bar 210 comprising selectable control elements 212 extend[ing] along the right edge of the presentation interface 200.” EX1005, ¶[0059]. The control elements 212 include “commands such as removing a video stream from the video strip 202, changing the transparency of the presentation interface 200[,] etc.” EX1005, ¶[0059].

An example of this operation is shown in FIGs. 5a and 5c, where Gurevich prevents the “default native presentation interface 162” (FIG. 5a) from being displayed and, instead, displays the video stream 160 at a different location within its altered presentation interface 170 along with “a tool bar 172 with selectable control elements to allow the display of the video stream 160 on the interactive surface 42 to be altered.” EX1005, ¶[0057].

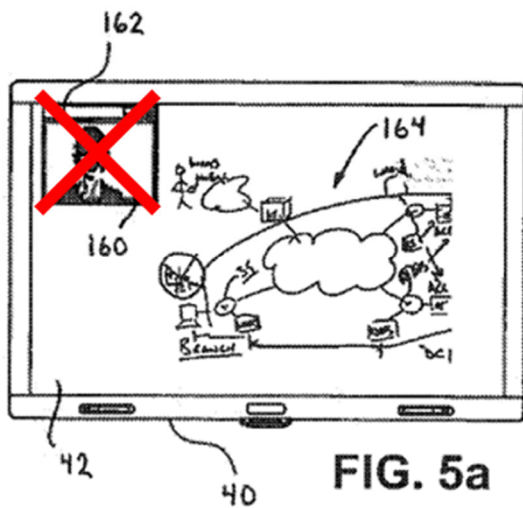


FIG. 5a

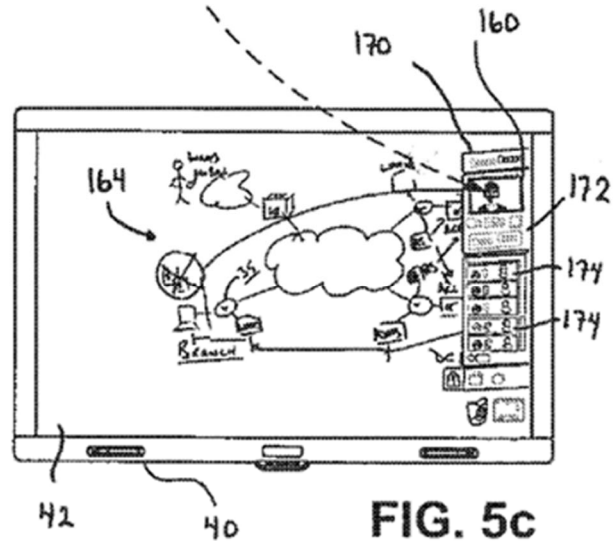


FIG. 5c

IV. GROUND 1A/1B: SALEH-502 ALONE DOES NOT ANTICIPATE OR RENDER OBVIOUS ANY OF THE CHALLENGED CLAIMS

Petitioner contends that Saleh-502 anticipates all claims of the '487 Patent (Ground 1A) or, alternatively, Saleh-502 alone renders all claims of the '487 Patent obvious (Ground 1B). As explained below, Saleh-502 does not disclose the claimed operation. Petitioner attempts to fill these gaps through inconsistent mappings and unsupported mixing-and-matching of distinct elements in Saleh-502. Further, Petitioner's attempt to fill missing claim limitations via expert testimony cannot support institution.

A. Ground 1A: Saleh-502 Does Not Disclose Limitations [1.f] or [1.g]

"A claim is anticipated [under 35 U.S.C. § 102] only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. Inc. v. Union Oil Co.*, 814 F.2d 628, 631 (Fed.

Cir. 1987). Moreover, “[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.’” *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1369 (Fed. Cir. 2008).

The Petition does not advance any inherency theory. Thus, to anticipate the claims under 35 U.S.C. § 102, “[t]he identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). As explained below, Saleh-502 does not anticipate the claimed features and, instead, Petitioner relies on inconsistent mappings and attempts to rearrange different interfaces in a manner that is not disclosed by Saleh-502 to fill the gaps.

1. The Petition does not identify a common “instruction for starting a video session” to meet Limitations [1.f] and [1.g]

Claim 1 recites “a selection menu to receive an instruction for starting a video conference session” (Limitation [1.f]) and that a videoconference window is overlaid on the interactive whiteboard session window “after receiving the instruction for starting the video conference session via the selection menu” (Limitation [1.g]). Petitioner inconsistently maps “the instruction for starting the video conference

session” to two different elements in Saleh-502 and, thus, the Petition cannot show that Saleh-502 discloses both Limitations [1.f] and [1.g] of claim 1.¹

First for Limitation [1.f], Petitioner identifies the “call button” as allegedly corresponding to the element that “receive[s] an instruction for starting a video conference session.” Pet., 31; EX1003, ¶113 (“Selecting this Call button from within the transparent menu 310 initiates the process of establishing a videoconference connection, which constitutes receiving an ‘instruction for starting a video conference session’ as recited in the claims.”). But Saleh-502 does not disclose that the selection of this call button would cause a videoconference window to be overlaid on the screen, as is required for Petitioner’s mapping of Limitation [1.g]. EX2013, ¶¶53-54. In fact, Petitioner does not even allege that a videoconference window is overlaid on the interactive whiteboard session window after selecting the call button (i.e., receiving the instruction for starting the video conference session). *See* Pet., 32-36.

Second for Limitation [1.g], Petitioner relies on a separate element—the “picture-in-picture (PIP) button”—to disclose the “receiving the instruction for

¹ Petitioner treats Limitations “1.f/8.b/15.b” as identical and Limitations “1.g/8.c/15.c” as identical. Pet., 30-34. Thus, all deficiencies for [1.f] and [1.g] of claim 1 apply equally to claims 8 and 15.

starting the video conference session via the selection menu” for Limitation [1.g]. Pet., 32-34. But the selection of the PIP button does not disclose “an instruction for starting a video conference session” (Limitation [1.f]) as this selection simply “swap[s] near and far video” in a video conference session that has *already been initiated*. EX1004, 7:63-64; EX2013, ¶54.

Petitioner’s reliance on the selection of the [yellow] Call button for disclosing “an instruction for starting a video conference session” and the separate selection of the [blue] “PIP button” for “*the* instruction for starting *the* video conference session via the selection menu” renders Petitioner’s theory internally inconsistent. EX1004, FIG. 6 (PO annotated).

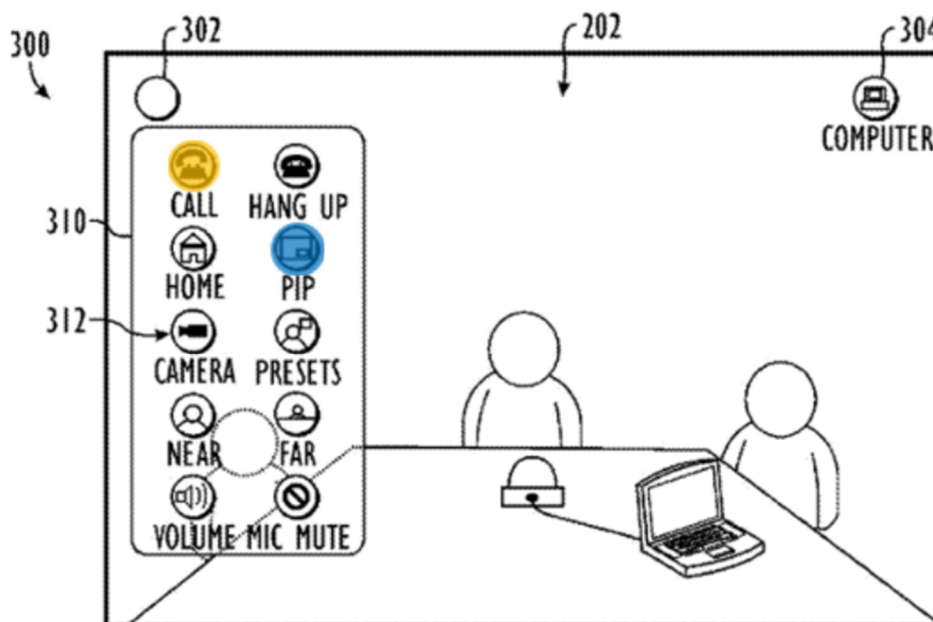


FIG. 6

Such inconsistent mappings cannot legally establish anticipation. *Net MoneyIN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1369-70 (Fed. Cir. 2008) (anticipation requires

disclosure of “all of the limitations of the claims arranged or combined in the same way as in the claim”).

2. *Limitations [1.g]/[8.c]/[15.c]: the petition fails to show “after receipt of the instruction for starting the video conference via the selection menu overlaid on the interactive whiteboard session window, a videoconference window to be overlaid on the interactive whiteboard session window”*

In addition to Petitioner’s inconsistent mappings—which are independently fatal to Ground 1A (*supra*, §IV.A.1)—Petitioner’s analysis of Limitation [1.g] renders Ground 1A deficient. Limitation [1.g] recites that the processors “cause ... a videoconference window to be overlaid on the interactive whiteboard session window” “after receiving the instruction for starting the video conference session via the selection menu overlaid on the interactive whiteboard session window.”

Petitioner’s analysis of this limitation is vague and confusing. Pet., 32-34. Nevertheless, the Petition identifies two elements of Saleh-502: the “picture-in-picture (PIP) button” and the icons of “layout control screen 580” for Limitation [1.g]. Pet., 33-34. Neither element discloses the claimed functionality.

a. *Petitioner’s unexplained analysis lacks particularity*

Petitioner’s theory is unclear. To start, Petitioner identifies Saleh-502’s PIP button (shown in Saleh-502’s FIG. 6), which Petitioner asserts can be toggled to produce picture-in-picture on the screen and “allow[s] the user to ‘swap near and far video in picture-in-picture (PIP).’” Pet., 33-34 (quoting EX1004, 7:62–64, 11:10–

20). The Petition then cites to “a layout control screen 580” that is illustrated in Saleh-502’s FIG. 18, which includes “various icons” to “allow adjustment of video size, picture-in-picture properties, including presence and removal, and can include a dual monitor emulation mode, which allows for two image streams to be displayed side-by-side on a single monitor.” Pet., 34 (quoting EX1004 20:21–27). The Petition abruptly concludes—without any explanation—that Saleh-502 discloses the claimed features without specifically identifying which of the two, distinct disclosures of Saleh-502 it is relying upon.

Referring to Saleh-502’s FIG. 18 (below left), “layout control screen 580” depicts four “icons” that are displayed on a handheld user interface device 500. EX2013, ¶¶61-62; EX1004, 14:36-55; 20:21-27, FIG. 18. On the other hand, Saleh-502’s FIG. 6 (below right) depicts a menu 310 and various buttons 312 that are displayed on the display device 200 of the videoconferencing unit 10. EX2013, ¶¶60-62; EX1004, 14:36-55, FIG. 1 (depicting videoconferencing unit 10).

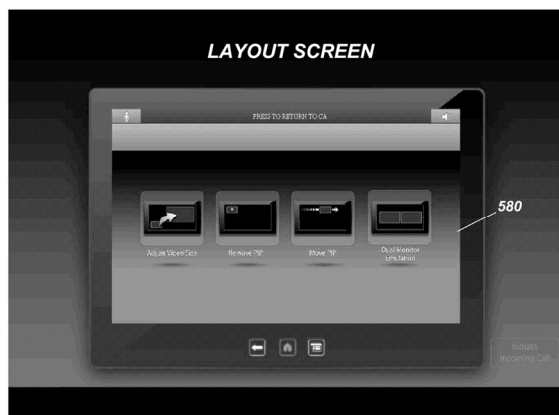


FIG. 18

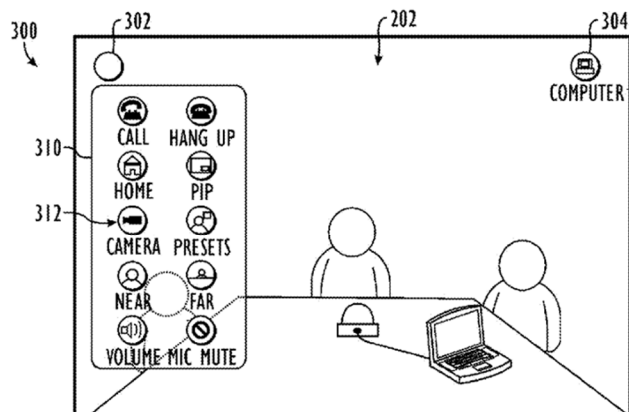


FIG. 6

Thus, Petitioner’s analysis relies on different icons that are displayed on different interfaces on different display screens. EX2013, ¶62. When accounting for Petitioner’s other inconsistent mappings (*supra* §IV.A.1), Petitioner’s claim 1 mapping relies on six distinct icons (four icons of screen 580, PIP button, and call button), three distinct interfaces (layout control screen 580, videoconferencing mode, and whiteboard mode), and two distinct display screens (screen of device 500 and screen 202 of device 200) to meet the features of claim 1.

The Petition’s unexplained reliance on multiple, distinct icons and interfaces that appear on two different devices cannot satisfy the statutory requirement that the Petition must set out “in writing and *with particularity*, each claim challenged, the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim” 35 U.S.C. § 312(a)(3); *see Harmonic v. Avid Tech*, 815 F.3d at 1363 (“[T]he petitioner has the burden from the onset to show with particularity why the patent . . . is unpatentable.”).

**b. The PIP button does not disclose the features of
Limitation [1.g]**

The PIP button allows a user to swap a near video—from the local camera coupled to the videoconferencing unit 10—with a far video—from a remote camera associated with an endpoint—on the screen. EX1004, 7:62–64; 11:40-44. A POSITA would understand Saleh-502’s disclosure refers to an interface in which one video (e.g., far video of remote participants) is shown on the entirety of the

display (*see* EX1004, FIG. 2) and another video (e.g., near video of local participants) is shown in a smaller display box (*see* EX1004, FIG. 18). EX2013, ¶59. The ability “to ‘swap near and far video in picture-in-picture (PIP)’” (Pet., 34 (quoting EX1004, 7:62-64) would simply swap the appearance of those videos (e.g., near video now shown in entire display and far view shown in the smaller display box). EX2013, ¶59. This does not disclose that selection of the PIP button would cause “a videoconference window to be overlaid on the interactive whiteboard session window.”

To the extent Petitioner meant to assert that the PIP button would initiate the display of the smaller display box, this is absent from the Petition and is therefore waived. Pet., 33-34. Nevertheless, even if this argument were considered, Saleh-502 does not disclose the PIP display box would be overlaid on the whiteboard content. EX2013, ¶60 (Saleh-502’s PIP feature concerns overlaying one video stream (near-end or far-end video) on top of another video stream). Both Petitioner and its expert concede this point. Pet., 34 (Saleh-502 discloses “a smaller video feed (e.g., near-end camera video) is displayed as an overlay window on top of the primary video content on the screen”) (citing EX1004, 7:58-64); EX1003, ¶120 (anticipation theory relies on “three independent disclosures” read together to arrive at this feature). Accordingly, the selection of Saleh-502’s PIP button does not disclose or suggest the features of Limitation [1.g].

c. The icons of the layout control screen do not disclose the features of Limitation [1.g]

The “icons” shown on the “layout control screen 580” of touch screen device 500 are distinct from the menu 310 displayed on screen 202 that Petitioner identifies as the claimed selection menu. Pet., 31²; *see* EX2013, ¶¶61-62.

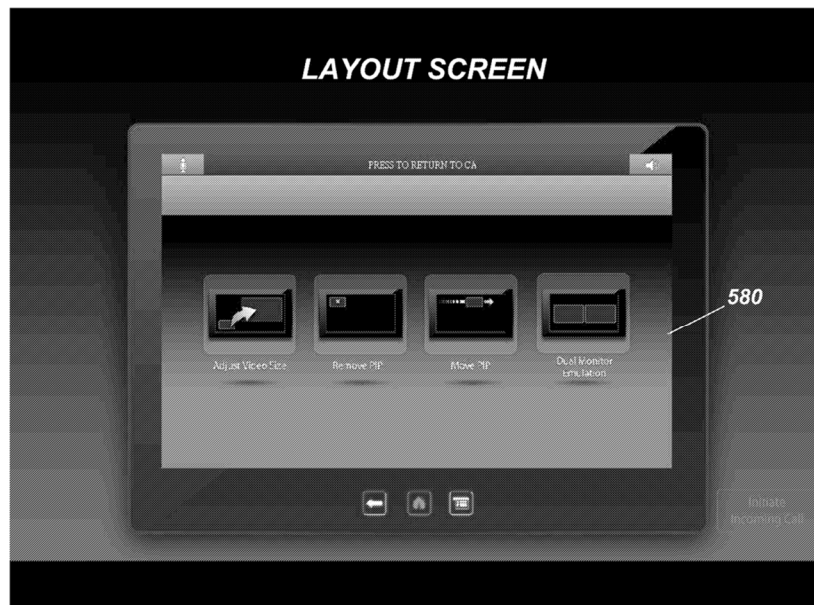


FIG. 18

EX1004, FIG. 18.

To the extent that Petitioner asserts that selection of any of the four icons of layout control screen 580 would meet Limitation [1.g], this would contradict Petitioner’s mapping of Limitation [1.f]. The Petition identifies menu 310 on screen

² Petitioner’s inconsistent mapping between the call button of menu 310 and the icons of layout control screen 580 is independently fatal to Petitioner’s Ground 1A for the same reasons as explained in Section IV.A.1.

202 as the claimed selection menu for Limitation [1.f]. Pet., 31-32. Limitation [1.g] recites that the instructions are received “via *the selection menu* overlaid on the interactive whiteboard session window” and, thus, any reliance on these different icons (or associated functionality) would render Petitioner’s theory inconsistent. Further, as clearly shown in FIG. 18 (above), the layout control screen 580 does not include a menu overlaid on any whiteboard content or whiteboard session window. EX1004, FIG. 18; EX2013, ¶62. Thus, regardless of the functionality of any of the icons of the “layout control screen 580,” they would **not** include “receiving the instruction for starting the video conference session via the selection menu overlaid on the interactive whiteboard session window,” as recited in Limitation [1.g].

Moreover, none of the identified icons of layout control screen 580 would result in “a videoconference window to be overlaid on the interactive whiteboard session window,” as claimed. Saleh-502 explains that these icons would allow a user to (1) “adjust [the] video size” of the display box; (2) “remove PIP”; (3) “move PIP”; and (4) perform “dual monitor emulation.” EX1004, FIG. 18; *see also id.*, 20:21–27; EX2013, ¶63. Saleh-502 does not disclose or suggest that any of the operations would result in a videoconference window that is overlaid on the interactive whiteboard session window. EX2013, ¶63. Accordingly, the selection of the icons of layout control screen 580 do not disclose or suggest the features of Limitation [1.g].

d. Dr. Almeroth’s combination of different portions of Saleh-502 does not establish anticipation

As described above, the two elements of Saleh-502 identified in the Petition do not disclose the features recited in Limitation [1.g]. Petitioner’s expert (Dr. Almeroth) concedes that the individual disclosures of Saleh-502 do not anticipate Limitation [1.g]. EX1003, ¶120. Instead, he must rely on the “converge[nce]” of “three independent disclosures” of Saleh-502. EX1003, ¶120. The Petition does not advance Dr. Almeroth’s convergence theory. Pet., 32-33. Accordingly, Petitioner has waived this theory.

Nevertheless, even if this were advanced in the Petition, this convergence of “three independent disclosures” is not sufficient for anticipation. *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.’”).

Dr. Almeroth explicitly relies on a combination of three distinct disclosures—each of which independently fails to disclose the claimed features (EX2013, ¶64)—to assert that “[t]hese *three disclosures together* establish that the system *has the components and functionality* to overlay a videoconference window on top of a whiteboard session window” and that “[a] POSITA reading *these disclosures*

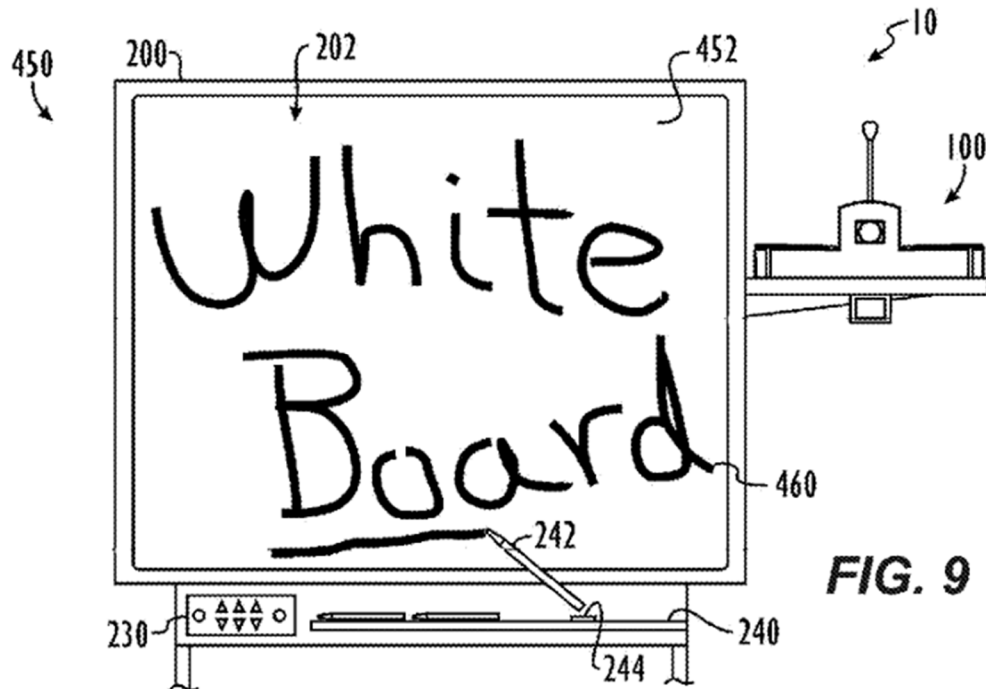
together would have understood that the system *is capable of* overlaying a videoconference window on a whiteboard session.” EX1003, ¶120 (emphasis added). Thus, Petitioner’s expert concedes that Saleh-502 does not explicitly disclose a single embodiment that performs the features recited in Limitation [1.g].

Dr. Almeroth provides only conclusory assertions that cannot meet Petitioner’s burden. *See* 37 C.F.R. § 42.65(a) (“Expert testimony that does not disclose the underlying facts or data on which the opinion is based is entitled to little or no weight.”). And whether or not Saleh-502’s components (i.e., hardware) were “capable of” performing the claimed operation (if modified or rearranged in a manner not disclosed in Saleh-502) cannot establish anticipation. *Net MoneyIN*, 545 F.3d at 1371 (“it is not enough that the prior art reference discloses part of the claimed invention, which an ordinary artisan might supplement to make the whole, or that it includes multiple, distinct teachings that the artisan might somehow combine to achieve the claimed invention.”).

3. *Limitations [1.f]/[8.b]/[15.b]: the Petition fails to show “wherein a selection menu to receive an instruction for starting a video conference session is overlaid on the interactive whiteboard session window”*

Limitation [1.f] recites “a selection menu to receive an instruction for starting a video conference session is overlaid on the interactive whiteboard session window.” Petitioner identifies “whiteboard content 452 [that] is displayed on the

whiteboard screen 202” as shown in Saleh-502’s FIG. 9 (inset below) as the claimed *interactive whiteboard session window*. Pet., 30.

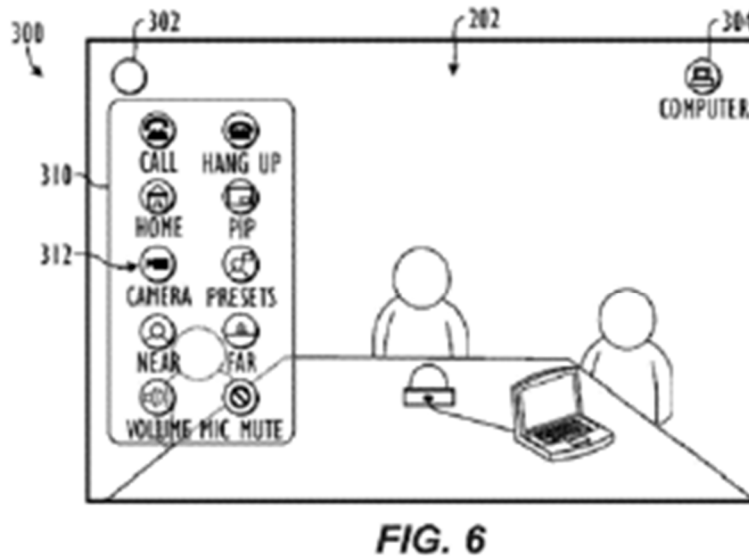


EX1004, FIG. 9. The Petition identifies two features for the claimed *selection menu*, neither of which are overlaid on whiteboard content 452. *See id.*

First, the Petition identifies “a control panel 230 with a button 231 configured to initiate a videoconference mode of operation” as the claimed *selection menu*. Pet., 31-32 (citing EX1004, 9:33–37, FIG. 5). However, as shown in FIG. 9 (above), the control panel 230 is a separate control interface mounted outside of the whiteboard screen 202. The buttons of control panel 230 are physical buttons that a user can manipulate to control certain aspects of the device 200, but are not positioned on the screen 202, itself. EX1004, FIG. 2 (depicted control panel 230 displaced from screen

202); *see e.g., id.* 9: 33–63. Accordingly, control panel 230 is not “overlaid on the interactive whiteboard session window” (i.e., the whiteboard content 452) as claimed and Petitioner’s first theory therefore falls short.

Second, the Petition identifies a “transparent menu 310” as the claimed *selection menu*. Pet., 31. But, Saleh-502 does not teach that this transparent menu 310 is overlaid on the whiteboard content 452, as is required for Petitioner’s anticipation theory. The transparent menu 310 is shown in FIG. 6 of Saleh-502 (inset below), where it is “displayed *over video* currently displayed on the screen 202.” EX1004, 11:3-5³, FIG. 6.



This 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,

³ All emphasis added unless otherwise noted.

10:61-67. Thus, Saleh-502 describes that when a *video feed* is being shown on screen 202, a button 302 is also displayed on the screen and can be selected to invoke the menu 310. EX2013, ¶68.

Saleh-502 does not disclose that this button 302 or menu 310 is displayed on screen 202 when the whiteboard content 452 is shown on the screen. EX2013, ¶69. Petitioner does not assert that the whiteboard content 452 is a video and a POSITA would have understood these to be distinct based on Saleh-502's disclosure. EX2013, ¶69; *See* EX1004, FIGs. 6, 9. The fact that Saleh-502's menu 310 appears in a different interface (displaying a video feed) than the interface used for the interactive whiteboard content does not meet the claimed operation. EX2013, ¶69. *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.'").

Recognizing that Saleh-502 does not disclose that menu 310 is displayed over whiteboard content 452, Petitioner overstates Saleh-502's teaching to bridge the gap in its anticipation theory. Specifically, Petitioner contends that Saleh-502's menu

310 is “available from all screens,” which would include when the screen is displaying the whiteboard content 452 Pet., 31 (citing EX1004, 10:66-11:5). The cited portion of Saleh-502 states that “the button 302 ... is available from all screens including those containing video of participants and content.” EX1004, 10:66-11:5. Read in context, this does not suggest that the specific menu of FIG. 6 would be displayed on top of whiteboard content 452. EX2013, ¶70. In fact, Saleh-502 only discusses its button 302 or menu 310 in the context of screens displaying video and omits these features when discussing operational modes where the user can annotate the screen. EX2013, ¶70; EX1004, 10:61-11:5 (menu 310 is invoked “while video is being displayed”; button 302 is available from all screens that “contain[] video”; menu 310 is “displayed over video”), FIG. 6 (only image depicting menu 310, which is displayed over a video conference), FIG. 8 (screen depicting a non-video annotation mode 400 in which button 302 and menu 310 are *not* displayed), FIG. 9 (screen depicting non-video whiteboard content 452 in which button 302 and menu 310 are *not* displayed).

The omission of button 302 from whiteboard content 452 is consistent with Saleh-502’s description of its whiteboard mode. EX2013, ¶71; EX1004, 13:42-60. To access whiteboard content 452, a user can pick up an electronic pen 242 from the tray 240 and the system will “automatically” go into the whiteboard mode 450. EX1004, 13:42-60. For example, if the system is displaying video data (e.g., the

video conference shown in FIG. 6) and a user picks up the pen 242, then “the videoconferencing unit 100 automatically goes into the annotation mode of operation” that “generates the whiteboard content 452” (e.g., whiteboard content 452 shown in FIG. 9). EX1004, 13:61-14:3. That is, whiteboard content 452 is displayed over the screen when the whiteboard operation is invoked and, likewise, would be displayed over any button 302 that was previously depicted on the screen. EX2013, ¶71. In this operation, neither button 302 nor menu 310 would be overlaid on whiteboard content 452. *Id.*

This interpretation is consistent with every other embodiment shown in Saleh-502. EX2013, ¶71. For example, Saleh-502 provides numerous embodiments of its menus and screens in FIGs. 11A-22. Although Saleh-502’s menus are displayed on various screens, these menus and icons are conspicuously absent from the display when the device is “in an annotation/whiteboard mode of operation.” EX1004, 21:29-30, FIG. 22; *see id.* at FIGs. 11A-21 (depicting menus and icons on various screens that are *not* in the whiteboard mode)

Because Saleh-502 does not disclose that menu 310 is overlaid on its whiteboard content 452 when the device is operating in the whiteboard mode, Petitioner must insert features from other, distinct interfaces to arrive at its anticipation theory. However, this rearrangement of Saleh-502’s different interfaces is inappropriate under anticipation. *Net MoneyIN*, 545 F.3d at 1371 (“[D]ifferences

between the prior art reference and a claimed invention, however slight, invoke the question of obviousness, not anticipation.”). For these reasons, Petitioner’s Ground 1A theory cannot succeed.

B. Ground 1B: Saleh-502 Alone Does Not Render Obvious Limitations [1.f] or [1.g]

Petitioner’s Ground 1B presents an obviousness theory that relies solely on Saleh-502 and the testimony of its expert. Pet., 34-36. Specifically, the Petitioner asserts that if Saleh-502 “does not expressly disclose overlaying a videoconference window on a whiteboard session window, it would have been obvious to a POSITA in view of Saleh-502’s disclosures.” Pet., 34.

1. The Petition’s obviousness rationale violates Rule 104(b)(4)

Recognizing that Saleh-502 does not disclose Limitation [1.g]—processors cause “a videoconference window to be overlaid on the interactive whiteboard session window” “after receiving the instruction for starting the video conference session via the selection menu overlaid on the interactive whiteboard session window”—Petitioner asserts that “[a] POSITA would have been motivated to apply this same PIP overlay approach to the whiteboard-videoconference context.” Pet., 35. As Petitioner concedes this operation is not disclosed in Saleh-502. *Id.* Further, there is no other prior art reference asserted for Ground 1B such that the Petition’s obviousness theory relies on expert testimony to supply the missing claim limitation. *See id.* (conceding “Saleh-502 does not expressly disclose” the claimed feature and

advancing a modification that “would have been a trivial and predictable extension” of Saleh-502’s teachings).

As the Office has explained, “expert testimony ... may not be used to supply a missing claim limitation.” Memorandum re Enforcement and Non-Waiver of 37 C.F.R. § 42.104(B)(4) And Permissible Uses of General Knowledge In Inter Partes Review (July 31, 2025) (July 2025 Memorandum) at 1. Petitioner’s asserted modification “to overlay the videoconference window on top of the whiteboard session window” (Pet., 65) is clearly used to supply a missing limitation. Because Ground 1B relies on testimony for that limitation—and not patents or printed publications—it violates Rule 104(b)(4) and the Board “shall deny” this ground. July 2025 Memorandum, 1.

2. *Ground 1B also relies on inconsistent mappings*

As explained above in Section IV.A.1, the Petition inconsistently relies on the selection of the Call button and the selection of the PIP button for “*the* instruction for starting *the* video conference session via the selection menu.” Petitioner’s modification “to overlay the videoconference window on top of the whiteboard session window” does not fix its inconsistent mappings. Pet., 34-35. Thus, Petitioner’s obviousness theory must fail for the same reasons as discussed above.

3. Limitations [1.f]/[8.b]/[15.b]: Ground 1B suffers from the same shortcomings as Ground 1A for Limitation [1.f]

For Ground 1B, Petitioner relies solely on Saleh-502 for disclosing Limitation [1.f] and no obviousness theory is presented for that limitation. *See* Pet., 31-32. Thus, Ground 1B cannot succeed for the same reasons presented above with respect to Ground 1A. *Supra*, IV.A.3.

V. GROUND 2: PETITIONER’S COMBINATION OF GUREVICH AND SALEH-502 DO NOT CURE THE ABOVE DEFICIENCIES OF SALEH-502 ALONE FOR LIMITATIONS [1.f] AND [1.g]

Similar to its analysis for Ground 1 (*supra*, n. 1), Petitioner’s Ground 2 theory treats claims 1, 8, and 15 as identical with respect to the below limitations. Pet., 62-69. Thus, the deficiencies related to claim 1, explained below, equally apply to independent claims 8 and 15.

A. Limitations [1.g]/[8.c]/[15.c]: Gurevich and Saleh-502 Fail to Render Obvious “After Receipt of *the Instruction* for Starting the Video Conference Via the Selection Menu Overlaid on the Interactive Whiteboard Session Window, a Videoconference Window to be Overlaid on the Interactive Whiteboard Session Window”

Limitation [1.g] recites that the processors “cause ... a videoconference window to be overlaid on the interactive whiteboard session window” “after receiving the instruction for starting the video conference session via the selection menu overlaid on the interactive whiteboard session window.” Petitioner does not address the timing aspect of this Limitation and Petitioner’s alleged *selection menu*

is displayed simultaneously with the alleged *videoconference window*—not *after* receiving instructions via the selection menu.

Petitioner contends that Gurevich’s video stream is presented “within a presentation interface [200]” that “includes a tool bar 210 with selectable control elements 212.” Pet., 66. Citing Gurevich’s FIGs. 3-8, Petitioner concludes that “[b]ecause Gurevich discloses presenting videoconference video within a window on the interactive surface 42 while the interactive board application component’s content (whiteboard session) is also displayed on the same surface, this constitutes overlaying a videoconference window on the interactive whiteboard session window.” Pet., 66. But the claim does not merely recite that processors cause a videoconference window to be overlaid on the interactive whiteboard session window; it requires the processors to cause the videoconference window to be overlaid “after receiving the instruction for starting the video conference session via the selection menu overlaid on the interactive whiteboard session window.” The Petition neglects to address this claim element or allege that this conditional functionality is disclosed in Gurevich. *See* Pet., 65-69. This omission alone is fatal to Petitioner’s Ground 2 theory.

Further, for its theory, the Petitioner states that “all of the various tool bars ... would include a control for starting a videoconference.” Pet., 63. However, the videoconference window is overlaid on Gurevich’s interactive surface 42 *at the*

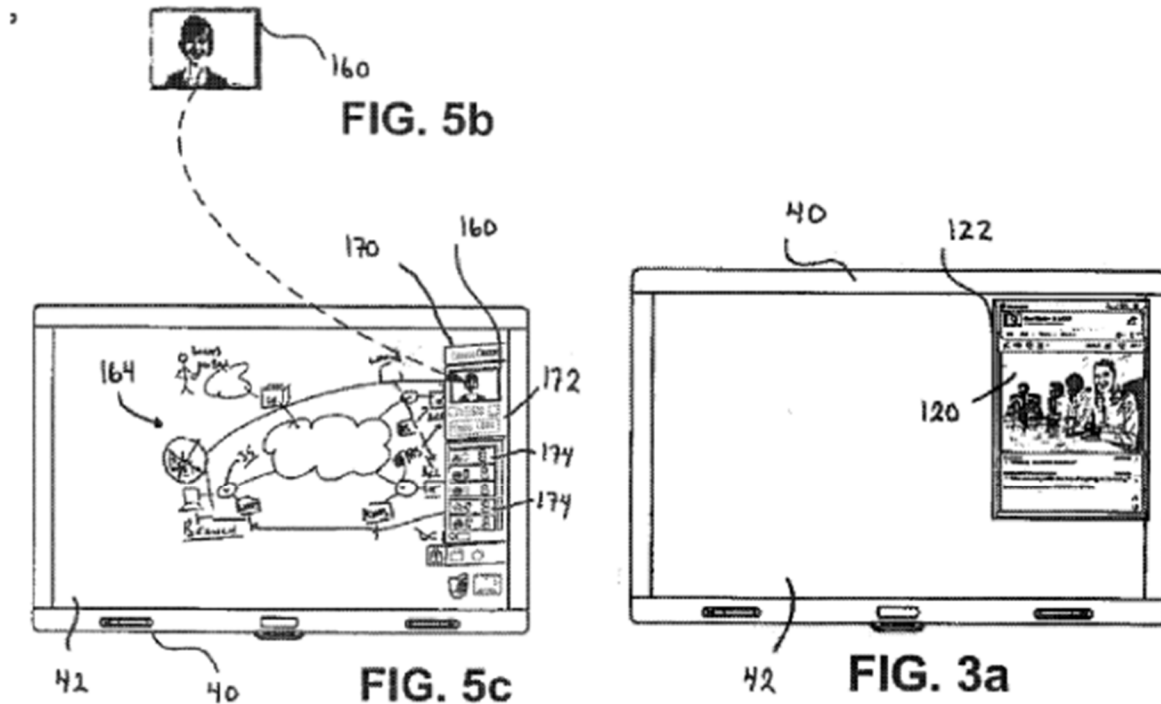
same time that the tool bars (the alleged selection menu) is initially displayed, not after receiving the instruction for starting the video conference session via the selection menu. EX2013, ¶75; Pet., 62-65. In Gurevich’s operation: (1) a video conference is established, (2) the video streams are “processed ... to separate the video streams from their native default presentation interfaces,” (3), “the video streams are presented in a horizontal video strip 202 within a presentation interface 200” that can include a tool bar 210 with control elements 212. EX2013, ¶75 (citing EX1005, ¶[0059]). Thus, the video stream is displayed *at the same time as* tool bar 210 and elements 212 and not “after receiving instructions for starting a video conference” via the tool bar 210. EX2013, ¶75. As such, Petitioner’s theory necessarily fails to meet the claims.

B. Limitations [1.f]/[8.b]/[15.b]: Gurevich and Saleh-502 Fail to Render Obvious “a Selection Menu to Receive an Instruction for Starting a Video Conference Session Is Overlaid On the Interactive Whiteboard Session Window”

Limitation [1.f]⁴ recites “a selection menu to receive an instruction for starting a video conference session is overlaid on the interactive whiteboard session window.” For Ground 2, Petitioner identifies Gurevich’s interactive surface 42 of

⁴ Petitioner treats Limitations “1.f/8.b/15.b” as identical and, thus, all deficiencies for [1.f] of claim 1 apply equal to claims 8 and 15. Pet., 62-65.

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 claimed *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]). Gurevich does **not** teach that its tool bars, icons, or other GUI elements are able “to receive an instruction for starting a video conference session” and, thus, Gurevich does not disclose the claimed *selection menu*. EX2013, ¶77. To overcome the gaps

in Gurevich's disclosure, Petitioner provides two theories—both of which are deficient.

1. Petitioner's obviousness theory in view of Gurevich alone is deficient

Petitioner's first theory relies solely on the disclosure of Gurevich and the testimony of Petitioner's expert (Dr. Almeroth). Petitioner contends that "a POSITA would understand all of the various tool bars disclosed in Gurevich ... would include a control for starting a videoconference as this is a necessary menu function for Gurevich's combined videoconferencing-whiteboard system." Pet., 63. As explained above in Section V.A, Gurevich's toolbars (e.g., 172, 210) are displayed simultaneously with the video stream, after a videoconference has already been initiated and selected for presentation. EX2013, ¶79 (citing EX1005, ¶[0052]). Because Gurevich's toolbar or other control elements are only displayed after a video conference has already been initiated, it would be illogical to modify Gurevich to include a start videoconference element on tool bar 210 when the videoconference has already been started. As Petitioner and Dr. Almeroth provide no explanation for why a POSITA would have made such a nonsensical modification, the Petition cannot show a reasonable likelihood that Petitioner would prevail with respect to any of the challenged claims.

Further, Petitioner's superfluous modification lacks any evidentiary support. As Gurevich does not disclose the claimed feature, Petitioner's theory relies

exclusively on expert testimony; but this testimony does not corroborate the assertions made in the Petition. For example, the Petition states 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). Yet, paragraph 177 of Dr. Almeroth’s declaration contains nothing in support of this statement. See EX1003, ¶177 (not even discussing “the Lync video application,” “provid[ing] a selection menu” or what “would have been obvious to a POSITA”). The Petition also asserts its modification “is the natural result of integrating a videoconferencing application (Microsoft Lync) with an interactive whiteboard application.” Pet., 62 (citing solely to EX1003, ¶179). Again, Dr. Almeroth does not corroborate that the proposed modification is the natural result of integrating a videoconferencing application like Microsoft Lync. See EX1003, ¶179 (not disclosing the “natural result” or any videoconferencing application (e.g., Microsoft Lync)). 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.”).

Finally, even if Petitioner's assertions were consistent with Gurevich's disclosure and supported by Dr. Almeroth, they would still be insufficient to establish obviousness. July 2025 Memorandum, 1. Gurevich does not disclose the claimed feature and Petitioner's reliance on expert testimony—rather than a patent or printed publication—to supply the missing claim limitation violates Rule 104(b)(4). Thus, the Board “shall deny” institution based on this theory. *Id.*

2. *Petitioner's modification of Saleh-502 also falls short*

Recognizing that “Gurevich *does not* expressly disclose a specific menu for starting a videoconference session overlaid on the whiteboard session window” (Pet., 64), Petitioner's second theory turns to Saleh-502 to remedy the deficiencies in Gurevich. But, as explained above in Section IV.A.3, Saleh-502 does not disclose Limitation [1.f] and the same deficiencies would likewise render Petitioner's modification deficient.

Nevertheless, even if Saleh-502 were assumed to disclose menu 310 in the whiteboard context, the Petition still does not provide a legally adequate motivation for combining Gurevich and Saleh-502 to achieve the specific claimed arrangement. Petitioner's proposed combination requires modifying Gurevich's toolbar—which includes controls for managing video streams that are *already being displayed*—to include a control for initiating a videoconference. EX2013, ¶80 (citing EX1003, ¶179). It is clear that the Petition's modification is to include a video initiation

button (e.g., Saleh-502's call button) to Gurevich's existing toolbar 172, 210. Pet., 65 (asserting modification is straightforward because "Gurevich already provides selectable control elements and participant icons in its alternative presentation interface" (e.g., toolbars 172/210)); EX1003, ¶179 (asserting modification of "adding a call-initiation control... to [Gurevich's] existing tool bar" and "adding a button to an existing toolbar"), ¶181 ("combination of Gurevich's overlaid tool bar 210 with selectable control elements 212 and Saleh-502's call-initiation menu").

As explained repeatedly herein, Gurevich's toolbar, icons, and other control elements are only displayed *after* the videoconference is initiated and it would be illogical to add "the specific videoconference-initiation control" of Saleh-502 (Pet., 65) to this interface when the videoconference *has already been initiated*. EX2013, ¶¶80-81. Gurevich's toolbar 210 discloses controls for repositioning, removing, and adjusting the transparency of video streams that are *already being presented*. EX1005, ¶¶[0057]-[0059]. A POSITA would not have modified Gurevich's toolbar (as Petitioner and its expert contend) to add a button to start a videoconference when that toolbar is only displayed after a videoconference has been started. EX2013, ¶¶80-81.

Petitioner does not identify any evidentiary basis to explain why Gurevich's toolbar 210, which is displayed *after* a videoconference has been initiated, would be modified to add a control element to start a videoconference. Instead, Petitioner

relies solely on uncorroborated conclusory statements from its expert that are insufficient to establish obviousness. EX1003, ¶¶179-181 (not citing to any evidence of record); *TQ Delta, LLC v. CISCO Sys., Inc.*, 942 F.3d 1352, 1358–59 (Fed. Cir. 2019) (“[c]onclusory expert testimony does not qualify as substantial evidence”). Without any logical or evidentiary basis for its modification, it is clear that the Petition is simply using the ’487 Patent’s claims as a roadmap to arrive at the proposed modification. Accordingly, Petitioner’s Gurevich-Saleh-502 theory cannot succeed.

VI. CONCLUSION

For the foregoing reasons, institution should be denied.

Dated: October 6, 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 October 6, 2026, complete copies of the foregoing Patent Owner's Preliminary Response and EX2013-EX2014 were served on Petitioner via email (by consent), at the following email address(s):

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