

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

YEALINK (USA) NETWORK TECHNOLOGY CO., LTD., AND YEALINK  
NETWORK TECHNOLOGY CO., LTD.,

Petitioners,

v.

BARCO N.V.

Patent Owner.

---

CASE: IPR2025-00598

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

---

**MOTION FOR ENTRY OF PROTECTIVE ORDER**

To facilitate the use of certain confidential third-party information produced in the co-pending litigation in this proceeding, with the consent of the third-party, the parties have agreed to an entry of a Protective Order in this proceeding. The parties' agreed-upon Protective Order is provided as Exhibit 2032 in this proceeding. The proposed Protective Order deviates from the Board's default protective order in one respect, specifically, it provides for a heightened level of confidentiality that is restricted to Outside Attorneys Eyes only, which removes Subsection 2(D) (In-house counsel) from the default protective order. Patent Owner recently moved for the same relief in IPR2024-01436, IPR2024-01437, IPR2024-01438, and IPR2024-01439, and the modified protective order was entered in each instance.

A party seeking to protect confidential information may seek entry of a protective order in a proceeding before the Board. *See, e.g., Garmin Int'l, Inc. v. Cuozzo Speed Techs. LLC*, IPR2012-00001, Paper 34 (PTAB Mar 14, 2013). Upon a showing of good cause, the Board may enter a Protective Order to protect from public disclosure such confidential information as disclosed by a party during the course of a proceeding before the Board. *See* 37 CFR § 42.54. Patent Owner intends to submit certain evidence of objective indicia of non-obviousness, including confidential third-party financial and licensing information as well as confidential sales information of Patent Owner. Patent Owner submits that, in light of the reasons

discussed herein, the added limitations are necessary in this proceeding, and good cause exists to enter the proposed Protective Order.

The third-party whose information Patent Owner intends to rely on has requested the entry of an “Outside Counsel Eyes Only” tier of protective order to protect its financial information. This sensitive financial information, and Patent Owner’s similarly situated financial information, would put Patent Owner and the third party at a competitive disadvantage if such information were to become public. Moreover, as Petitioner is a competitor of both Patent Owner and the third party, Petitioner’s in-house legal team should similarly be excluded from receiving this sensitive financial information. The terms of the proposed Protective Order are consistent with that entered in the co-pending district court litigation and would not impose an undue burden on either party. Patent Owner accordingly seeks heightened protection for such materials disclosed in connection with this proceeding. A motion to seal is being filed contemporaneously. The proposed changes do not affect access to confidential information for employees and representatives of the Patent and Trademark Office who have a need for access to the confidential information. The revisions are noted in redline showing changes from the Board’s Protective Order in Attachment A hereto.

As noted above, Petitioner has agreed to the proposed protective order. For the foregoing reasons, good cause exists for entering the proposed Protective Order (Exhibit 2032) in this proceeding.

Respectfully submitted,

Dated: January 15, 2026

By: /Erik Halverson/  
Erik Halverson  
Reg. No. 73,552  
**K&L GATES LLP**  
4 Embarcadero Center, Suite 1200  
San Francisco, CA 94111  
erik.halverson@klgates.com  
T: (415) 882-8238  
F: (415) 882-8220

*Counsel for Patent Owner*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 15, 2026, I caused a true and correct copy of the foregoing to be served on the following counsel of record for Petitioners by electronic mail to the following addresses:

Stephen Yang  
stephen.yang@dentons.com  
Kevin R. Greenleaf  
kevin.greenleaf@dentons.com  
Timothy C. Bickham  
timothy.bickham@dentons.com  
Forrest Gothia  
forrest.gothia@dentons.com  
Dentons US LLP  
233 South Wacker Drive,  
Suite 5800  
Chicago, IL 60606  
Tel: (212) 398-4890  
Fax: (212) 768-6800  
Email: ipt.docketchi@dentons.com

By: /Erik Halverson/  
Erik J. Halverson  
Reg. No. 73,552

**ATTACHMENT A**

~~DEFAULT~~MODIFIED AGREED PROTECTIVE ORDER

The following ~~Default~~ Protective Order will govern the filing and treatment of confidential information in the proceeding:

~~Default~~Modified Agreed Protective Order

This protective order governs the treatment and filing of confidential information, including documents and testimony.

1. Confidential information shall be clearly marked either “CONFIDENTIAL PROTECTIVE ORDER MATERIAL,” or “ATTORNEYS EYES ONLY PROTECTIVE ORDER MATERIAL.”

2. Access to CONFIDENTIAL PROTECTIVE ORDER MATERIAL ~~confidential information~~ is limited to the following individuals who have executed the acknowledgment appended to this order:

(A) Parties. Persons who are owners of a patent involved in the proceeding and other persons who are named parties to the proceeding.

(B) Party Representatives. ~~Representatives~~ Outside counsel of record for a party in the proceeding, including employees of outside counsel of record’s law

firm(s) including associate attorneys, paralegals and regular employees. Party Representatives shall not include any in-house counsel or other representatives of the parties (other than outside counsel of record).

(C) Experts. Retained experts of a party in the proceeding who further certify in the Acknowledgement that they are not a competitor to any party, or a consultant for, or employed by, such a competitor with respect to the subject matter of the proceeding.

(D) In-house counsel. In-house counsel of a party.

(E) Support Personnel. Administrative assistants, clerical staff, court reporters and other support personnel of the foregoing persons who are reasonably necessary to assist those persons in the proceeding shall not be required to sign an Acknowledgement, but shall be informed of the terms and requirements of the Protective Order by the person they are supporting who receives confidential information.

(F) The Office. Employees and representatives of the United States Patent and Trademark Office who have a need for access to the confidential information shall have such access without the requirement to sign an Acknowledgement. Such employees and representatives shall include the Director, members of the Board and

their clerical staff, other support personnel, court reporters, and other persons acting on behalf of the Office.

3. Access to ATTORNEYS EYES ONLY PROTECTIVE ORDER MATERIAL is limited to the following individuals who have executed the acknowledgment appended to this order:

Those identified in Section 2(A), (B), (C), (E), and (F).

34. Employees (e.g., corporate officers), consultants, or other persons performing work for a party, other than those persons identified above in 2 (d)(2)(A)–(E), shall be extended access to confidential information only upon agreement of the parties or by order of the Board upon a motion brought by the party seeking to disclose confidential information to that person and after signing the Acknowledgment. The party opposing disclosure to that person shall have the burden of proving that such person should be restricted from access to confidential information.

4. Persons receiving ~~confidential~~ Confidential information shall use reasonable efforts to maintain the confidentiality of the information, including:

(A) Maintaining such information in a secure location to which persons not authorized to receive the information shall not have access;

(B) Otherwise using reasonable efforts to maintain the confidentiality of the information, which efforts shall be no less rigorous than those the recipient uses to maintain the confidentiality of information not received from the disclosing party;

(C) Ensuring that support personnel of the recipient who have access to the confidential information understand and abide by the obligation to maintain the confidentiality of information received that is designated as confidential; and

(D) Limiting the copying of confidential information to a reasonable number of copies needed for conduct of the proceeding and maintaining a record of the locations of such copies.

5. Persons receiving ~~confidential~~Confidential information shall use the following procedures to maintain the confidentiality of the information:

(A) Documents and Information Filed With the Board.

(i) A party may file documents or information with the Board along with a Motion to Seal. The Motion to Seal should provide a non-confidential description of the nature of the confidential information that is under seal, and set forth the reasons why the information is confidential and should not be made available to the public. A party may challenge the confidentiality of the information by opposing the Motion

to Seal. The documents or information shall remain under seal unless the Board determines that some or all of it does not qualify for confidential treatment.

(ii) Where confidentiality is alleged as to some but not all of the information submitted to the Board, the submitting party shall file confidential and non-confidential versions of its submission, together with a Motion to Seal the confidential version setting forth the reasons why the information redacted from the non-confidential version is confidential and should not be made available to the public. A party may challenge the confidentiality of the information by opposing the Motion to Seal. The non-confidential version of the submission shall clearly indicate the locations of information that has been redacted. The confidential version of the submission shall be filed under seal. The redacted information shall remain under seal unless the Board determines that some or all of the redacted information does not qualify for confidential treatment.

(B) Documents and Information Exchanged Among the Parties. Documents (including deposition transcripts) and other information designated as confidential that are disclosed to another party during discovery or other proceedings before the Board shall be clearly marked as either “CONFIDENTIAL PROTECTIVE ORDER MATERIAL” or “ATTORNEYS EYES ONLY PROTECTIVE ORDER

MATERIAL.”~~“PROTECTIVE ORDER MATERIAL”~~ and shall be produced in a manner that maintains its confidentiality.

6. Within 60 days after the final disposition of this action, including the exhaustion of all appeals and motions, each party receiving confidential information must return, or certify the destruction of, all copies of the confidential information to the producing party.

(k) Standard Acknowledgement of Protective Order. The following form may be used to acknowledge a protective order and gain access to information covered by the protective order:

**Standard Acknowledgment for Access to Protective Order Material**

I \_\_\_\_\_, affirm that I have read the Protective Order; that I will abide by its terms; that I will use the confidential information only in connection with this proceeding and for no other purpose; that I will only allow access to support staff who are reasonably necessary to assist me in this proceeding; that prior to any disclosure to such support staff I informed or will inform them of the requirements of the Protective Order; that I am personally responsible for the requirements of the terms of the Protective Order and I agree to submit to the jurisdiction of the Office and the United States District Court for the

Eastern District of Virginia for purposes of enforcing the terms of the Protective Order and providing remedies for its breach.

[Signature]