

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

PATENT OWNER'S RESPONSE

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Ex. 2001	U.S. Publication No. 2015/0121466 (“Brands”)
Ex. 2002	Reserved
Ex. 2003	Reserved
Ex. 2004	Declaration of Dr. Michael Brogioli
Ex. 2005	Curriculum Vitae of Dr. Michael Brogioli
Ex. 2006	September 22, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2025-00491
Ex. 2007	Reserved
Ex. 2008	December 15, 2025 Deposition Transcript of Kevin C. Almeroth in IPR2025-00598
Ex. 2009	Reserved
Ex. 2010	Barco Sales Data (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2011	Crestron License Agreement (<i>Confidential and Redacted Versions Filed</i>)
Ex. 2012	<i>Barco and Crestron announce patent license agreement regarding a set of essential ClickShare patents</i> , BARCO (Sept. 12, 2023) https://web.archive.org/web/20240810204702/https://www.barco.com/en/about/press-releases/barco-and-crestron-announce-patent-license-agreement-regarding-a
Ex. 2013	<i>ClickShare conferencing & collaboration</i> , BARCO (April 1, 2025), https://web.archive.org/web/20250401012647/https://www.barco.com/en/products/clickshare-conferencing-collaboration#expand
Ex. 2014	<i>ClickShare Button</i> , BARCO (February 12, 2025) https://web.archive.org/web/20250212164931/https://www.barco

Exhibit	Description
	.com/en/product/clickshare-conferencing-button
Ex. 2015	Reserved
Ex. 2016	Reserved
Ex. 2017	List of Products Covered by Barco Patents accessible at: https://www.barco.com/en/about/terms-conditions/patents
Ex. 2018	<i>Patent</i> , CRESTRON (June 12, 2025) https://www.crestron.com/legal/patents?page=1
Ex. 2019	Crestron Electronics Private Company Profile, PITCHBOOK
Ex. 2020	Reserved
Ex. 2021	Reserved
Ex. 2022	Reserved
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Ex. 2024	Reserved
Ex. 2025	<i>ClickShare CX-30</i> , BARCO (October 8, 2025) https://web.archive.org/web/20250826005128/https://www.barco.com/en/product/clickshare-cx-30
Ex. 2026	David Martens and Willem Van Iseghem, <i>Security Whitepaper ClickShare Conference</i> , BARCO (March 23, 2020)
Ex. 2027	Gary Kayye, <i>Here's a Detailed Look at the New Barco ClickShare Conference From the Launch Event in NYC</i> , RAVE (January 27, 2020) https://web.archive.org/web/20251017182523/https://www.ravepubs.com/heres-a-detailed-look-at-the-new-barco-clickshare-conference-from-the-launch-event-in-nyc/
Ex. 2028	Gary Kayye, <i>Here's a Detailed Look at the New Barco ClickShare Conference From the Launch Event in NYC</i> , RAVE (January 27, 2020)

Exhibit	Description
	https://web.archive.org/web/20201021153400/https://www.ravepubs.com/heres-a-detailed-look-at-the-new-barco-clickshare-conference-from-the-launch-event-in-nyc/
Ex. 2029	Rebekah Carter, <i>ClickShare Delivers Wireless Conferencing</i> , UC TODAY (March 19, 2020) https://web.archive.org/web/20251017184342/https://www.uctoday.com/collaboration/clickshare-delivers-wireless-conferencing/
Ex. 2030	Video: RAVE [PUBS] <i>Barco Debuts ClickShare Conference at Launch Event in NYC!</i> , at 0:00 to 5:13 (Streamed live on YouTube, Jan. 27, 2020) https://www.youtube.com/live/SnOk-VjUJ0U .
Ex. 2031	Excerpts from April 25, 2025 Deposition Transcript of Erwin Six
Ex. 2032	Modified Protective Order

I. INTRODUCTION

U.S. Patent No. 11,966,347 (the “’347 Patent”) describes and claims a novel conferencing system, allowing a user to connect a processing device (e.g., laptops or mobile devices) to functional devices (e.g., a camera or microphone in a conference room), via a peripheral device that enables communications from a base unit to the processing device. *See*, Ex. 1001, Abstract, Independent Cls. 1, 12, 23, 27. This novel arrangement allows users to access higher quality functional devices (e.g., video cameras) in a meeting context while still managing and sharing content from a user’s processing device (e.g., a laptop). *Id.*, 1:47-52. Prior technology, including Patent Owner’s own *Beel* reference, as well as *Kaplan*, was ***presentation focused***, unidirectional communication from a processing device to a display (sometimes through a base unit). The ’347 Patent, on the other hand, claims representing the functional devices as endpoints in the peripheral device and allows bidirectional communication enabling users to utilize a variety of different conferencing systems (with respect to software and hardware), without the need for reconfiguration of the user’s processing device (laptop). Ex. 1001, Cl. (“wherein the first processed video data is ***sent to the first peripheral device***...wherein the ***base unit receives*** the second processed data”) (emphasis added)¹. Said otherwise, the

¹ All emphasis is added unless otherwise noted.

'347 Patent allows for a user to join video conferences accessing a conference room's higher quality functional devices without regard for the specific hardware or conferencing platform of the conferencing system or conference room.

The '347 Patent inventors recognized a desire to provide high-quality functional devices to mobile devices to accommodate the increasing reliance on digital meetings. Ex. 1001, 1:41-52. The Petition obviousness challenge relies on prior presentation-focused technology (*Beel* and *Kaplan*) in combination with systems which recognized the need to provide improved functional devices, but provided competing approaches.

Dinka exemplifies one of these competing approaches. *Dinka* is directed to a media appliance, such as a television set, which is used to allow a local user to participate in a digital meeting. Ex. 1006, Title, Abstract. *Dinka* recognized the ability to participate in these meetings via personal devices, but instead opted to develop specialized television sets or set-top boxes. Ex. 1006, 2:1-18. These television sets include all the embedded hardware and processors to participate in these calls. Ex. 1006, 2:19-30. While laptops and mobile devices can still participate in virtual conferencing, *Dinka* presents a special purpose integrated solution to provide improved peripherals in the meeting room context.

Van de Laar presents another competing approach of providing functional devices to a processing device. *Van de Laar* describes a wireless docking host and

protocol to manage the connection from mobile devices (“dockees”) and peripherals. Ex. 1007, ¶¶72-73. Rather than rely on a special-purpose peripheral that facilitates communication between the wireless docking host and dockee, the embedded communication units (e.g., WiFi or Bluetooth) are used to communicate to the wireless docking host. Ex. 1007, ¶76. The embedded communication units allow users to easily switch presenters, share content, and collaborate together. Ex. 1007, ¶¶80, 82.

Neither *Dinka* nor *Van de Laar* disclose a peripheral device to communicate with a base node, as claimed by the ’347 Patent. *See* Ex. 1001, Cls. 1, 12, 23, 27. In attempt to reconstruct the ’347 Patent, the Petition supplements *Dinka*’s and *Van de Laar*’s teachings with prior presentation systems (*Beel* and *Kaplan* respectively). Both grounds 1) stretch the teachings of the cited references far beyond what reasonably disclosed to a POSITA; and 2) ignore *Dinka*’s and *Van de Laar*’s underlying design considerations to achieve systems which compete with those claimed by the ’347 Patent. Additionally, both Grounds “optionally” rely on *Christison*—a reference used during prosecution to reject the ’347 Patent—for the limited purpose of alleging that exposing a functional device on an endpoint was known. Petition, 17-18, 43-44. In light of the hindsight driven approach duplicated from the prosecution of the ’347 Patent, the Petition fails to provide that all elements of the ’347 Patent were obvious and that a POSITA would be motivated to arrive at

the claimed invention.

Moreover, the non-obviousness of each claim is strongly supported by undisputable objective indicia of non-obviousness, such as the commercial success and licensing of the patented technology by those in the industry. Notably, controlling Federal Circuit law requires strong consideration of Patent Owner's evidence of acquiescence in the industry (through licenses by sophisticated competitors); Patent Owner's commercial success in this space further supports the non-obviousness of the Challenged Claims. Accordingly, the Board should uphold the patentability of each of the challenged claims.

II. THE '347 PATENT

A. Overview

The inventors of the '347 Patent recognized certain functionalities for conferencing, like audio and video on portable devices (e.g., laptops and mobile devices) often rely on lower quality integrated functional devices (cameras and microphones). Ex. 1001, 1:47-49. The '347 Patent describes a system that makes higher quality functional devices available (regardless of the manufacturer) to meeting participants (regardless of the meeting platform) and provides the necessary hardware and software for accomplishing these goals, as depicted in Fig. 5. Ex. 1001, 1:22-25, 1:47-52, 1:56-59, Fig. 5; Ex. 2004, ¶49.

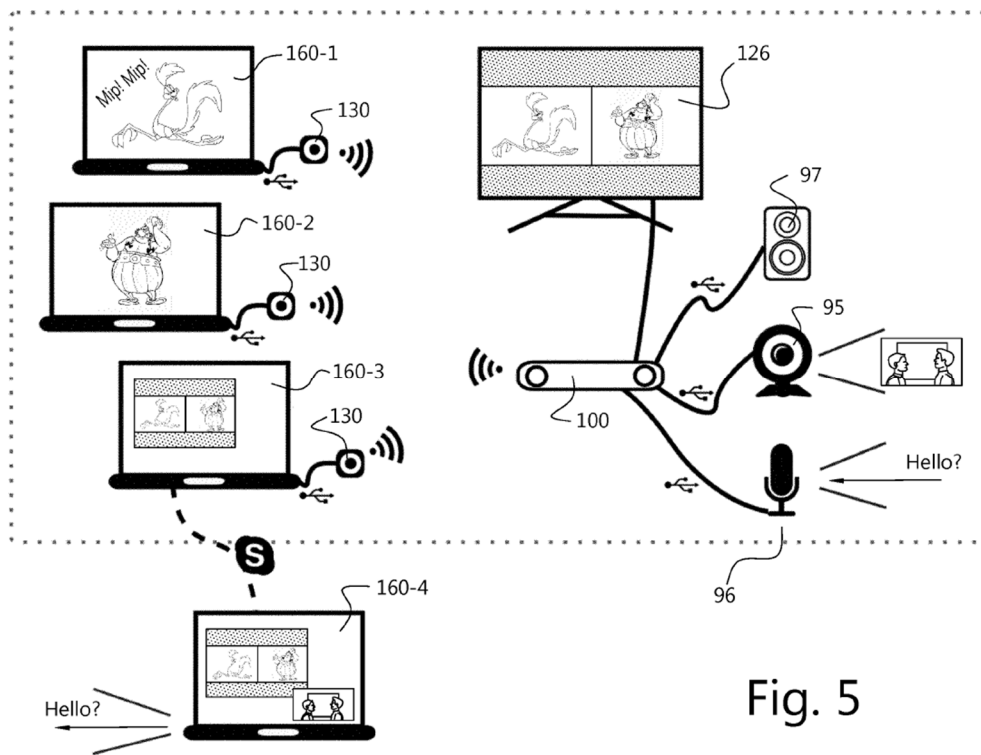


Fig. 5

Ex. 1001, Fig. 5.

Fig. 5 depicts four processing devices (e.g., laptops) 160-1, 160-2, 160-3, and 160-4, where processing device 160-4 is participating in the meeting over a unified communications call with processing device 160-3 that is residing in the same location as processing devices 160-1 and 160-2. Ex. 1001, 19:8-21. Both processing devices 160-3 and 160-4 share a unified communications call client, which may require additional device configurations. Ex. 1001, 19:18-21; Ex. 2004, ¶50. The processing devices 160-1, 160-2, 160-3 are connected to respective peripheral devices 130 which enable communication with base unit 100. Ex. 1001, 19:15-18; Ex. 2004, ¶50. The data from, for example, camera 95 and microphone 96 connected to the base unit 100, is sent to the base unit 100, which communicates the data via

the peripheral device 130 to the processing device 160-3. Ex. 1001, 18:39-51, 19:22-29; Ex. 2004, ¶50. Once captured, the data can be used in an application (like Skype for example). Ex. 1001, 18:51-57; Ex. 2004, ¶51. So, the laptops can wirelessly access the functional devices connected to the base unit 100 via peripheral device 130, and these functional devices are exposed natively via an endpoint of peripheral device 130. Ex. 1001, 19:58-61, Fig. 5; Ex. 2004, ¶51.

B. Claim Construction

The Petition was filed after November 13, 2018, and, as such, the proper claim construction standard to be applied is articulated in *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005) (en banc), in accordance with its regulation, 37 C.F.R. § 42.100(b). *Immunex Corp. v. Sanofi-Aventis U.S. LLC*, 977 F.3d 1212, 1216 (Fed. Cir. 2020). For the purposes of this proceeding, the claims of the '347 Patent require no construction as they are valid under their plain and ordinary meaning. Ex. 2004, ¶52.

C. Level of Ordinary Skill in the Art

Patent Owner does not dispute Petitioner's proposed level of skill in the art (Petition, 5) at this time. Dr. Brogioli qualifies as a POSITA with respect to the '347 Patent. Ex. 2004, ¶¶1-48; Ex. 2005.

III. OVERVIEW OF THE CITED REFERENCE

A. *Beel* (Ex. 1005)

Beel is assigned to Patent Owner and is a continuation of U.S. App. No. 13/270,659 which issued as U.S. Patent No. 8,756,348. Ex. 1005, Title Page. U.S. Patent No. 8,756,348 was cited during prosecution and the challenged claims were already allowed over *Beel* and the challenges raised by the Petition. Ex. 1004, 252-257. *Beel* recognized a need to improve presenting and collaboratively working on content in an in-person meeting-setting and provides for presentation capabilities. Ex. 1005, ¶¶113-116; *see also id.*, ¶¶15-38; Ex. 2004, ¶¶53-54.

Beel Figure 1a depicts a meeting room 30 where multiple participants 37 with processing devices (e.g., laptops) 31 are coupled to peripheral devices (or “connection units”) 47 adapted to communicate media content to a base node 36 connected to a display 44:

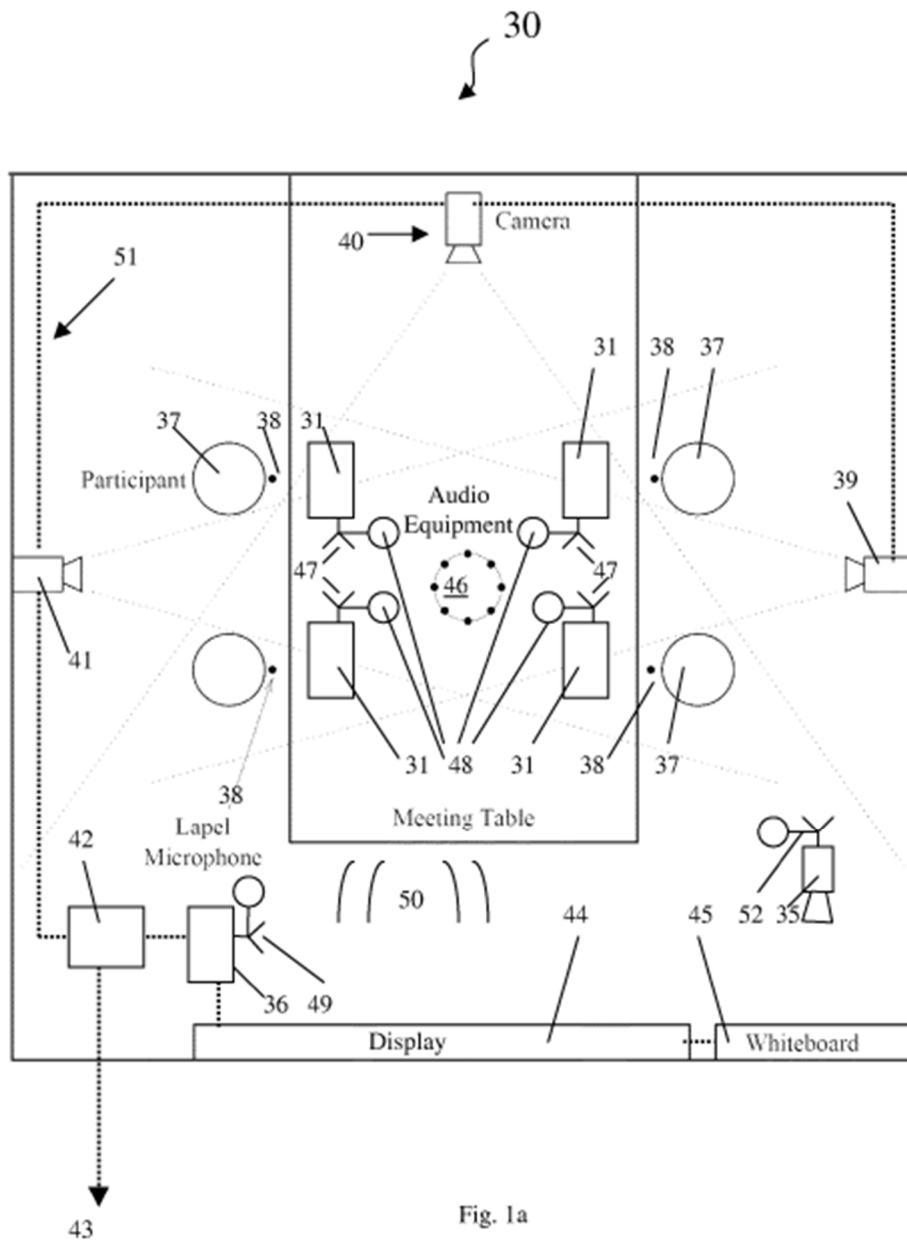


Fig. 1a

Ex. 1005, ¶¶117, 119, 124, Fig. 1a; Ex. 2004, ¶¶55-56. The user's processing device 31, peripheral devices 47, and base node 36 form a communication network for linking to the central display 44. Ex. 1005, ¶126; Ex. 2004, ¶¶57, 59.

Figure 1a also depicts optional equipment such as cameras 39, 40, and 41 to record progress of a meeting and microphones 38 to transfer audio to a processing

device 31 or a loud speaker attached to the base node 36 or part of the display 44. Ex. 1005, ¶120. These outputs can be recorded and stored to provide a complete record of the events of the meeting. Ex. 1005, ¶121; Ex. 2004, ¶58.

The user can share audio data from the processing device to the base node via the peripheral device. Ex. 1005, ¶316; Ex. 2004, ¶57. This audio sharing is done with standard drivers and does not require special software installation. Ex. 1005, ¶317; Ex. 2004, ¶57. Once received, the audio data can be shared in the meetings from the base node. Ex. 1005, ¶319.

Additionally, a software application that is stored on the peripheral device and run on the processing device captures display data available on the processing device before transmitting via the peripheral device to the base node. Ex. 1005, ¶320; Ex. 2004, ¶59.

B. *Dinka* (Ex. 1006)

Dinka, assigned to Skype, is directed to a television set capable of hosting bidirectional communication sessions with remote users via the network, but lacks any disclosure of any peripheral device as claimed in the '347 Patent. Ex. 1006, Title, Assignee, Abstract. *Dinka* recognized that packet-based communications were most commonly used on a personal computer and argued that it would be desirable to utilize packet-based communication on a television set or set box plugged into a television. Ex. 1006, 2:1-4, 2:19-24; Ex. 2004, ¶60. *Dinka* proposes

a television designed to provide a secondary embedded functionality of VoIP calling.

Ex. 1006, 7:20-21; Ex. 2004, ¶61. Dinka removes the claimed processing device completely, relying instead on special-purpose hardware in the form of its television.

Ex. 1006, 2:20-24.

C. *Kaplan* (Ex. 1008)

Kaplan, like *Beel*, describes transmitting video content from a computer to a display device. Ex. 1008, Abstract. The transmitter connects to a USB port of a computer. Ex. 1008, ¶17; Ex. 2004, ¶65. The receiver includes one or more video and audio outputs and connects to a display to present received content. Ex. 1008, ¶16. The system also includes a remote control 130 which controls the playback of video footage on the display device. Ex. 1008, ¶19. Together, these components provide a system to provide video footage accessible on a computer to a display device. Ex. 1008, ¶19; Ex. 2004, ¶¶66-67. Figure 2 below shows the remote control 130, receiver 110 connected to a display device 210, and transmitter 120 connected to a computer 220:

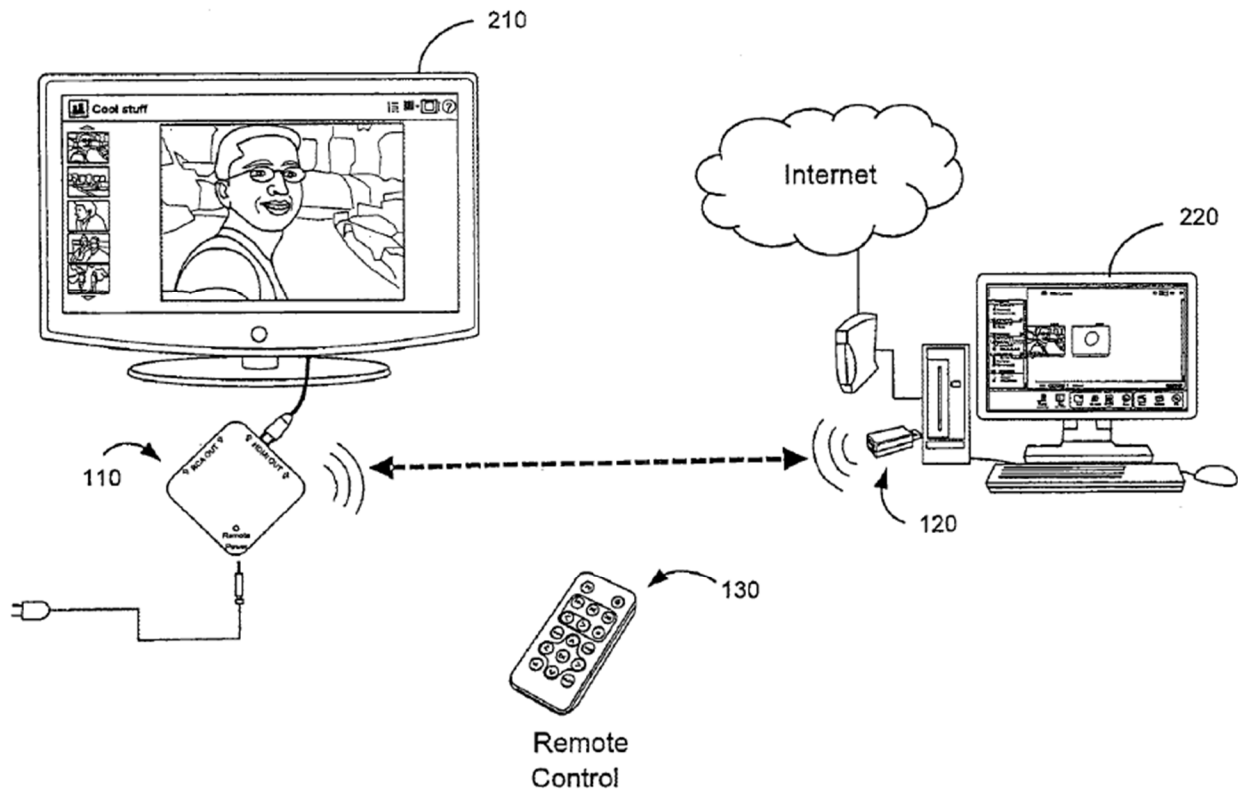


FIG. 2

Ex. 1008, Fig. 2, ¶21. *Kaplan* fails to disclose any transmission of video data from any base unit to any peripheral.

A key benefit identified in *Kaplan* is its “walled-garden” approach. Ex. 1008, ¶¶21, 53. The transmitter and receiver in *Kaplan* are pre-paired prior to shipment from the manufacturer so no configuration is required by the user before first use. *Id.*, ¶21. This approach streamlines *Kaplan*’s system from the first use, alleviating risks of unwanted wireless interaction between system components with non-system components. *Id.*; Ex. 2004, ¶68.

D. *Van de Laar* (Ex. 1007)

Van de Laar provides a system for wireless docking that enables multiple “dockees” to wirelessly dock to a host device in an easy-to-use manner, enabling shared usage of A/V peripherals without causing interference. Ex. 1007, ¶9; Ex. 2004, ¶62. A “dockee” in *Van de Laar* is a mobile device (e.g., a laptop, phone, tablets, portal media players, cameras, and electronic watches). Ex. 1007, ¶¶6, 72; Ex. 2004, ¶62.

The system includes a host device coupled to a number of peripherals (e.g., a graphical input/output devices and audio output devices) for rendering audio or video data and capable of wireless communication with a dockee. Ex. 1007, ¶74; Ex. 2004, ¶63.

The docking process provides connections to primary dockees and secondary dockee devices. Ex. 1007, ¶78; Ex. 2004, ¶64. Primary dockees gain control of at least one peripheral device to render AV data, while secondary dockee devices only receive the AV data rendered on the peripherals without gaining control. Ex. 1007, ¶¶78, 82; Ex. 2004, ¶64.

E. *Christison* (Ex. 1011)

Christison was relied on by the examiner during prosecution. Ex. 1004, 427-433. *Christison* is directed towards a wireless USB hub and improving throughput for devices in USB systems containing both wired and wireless USB devices. Ex.

1011, Title, 2:18-20. *Christison's* system includes a host 200 and external USB device 210 with built-in wireless adapters 201, 211.

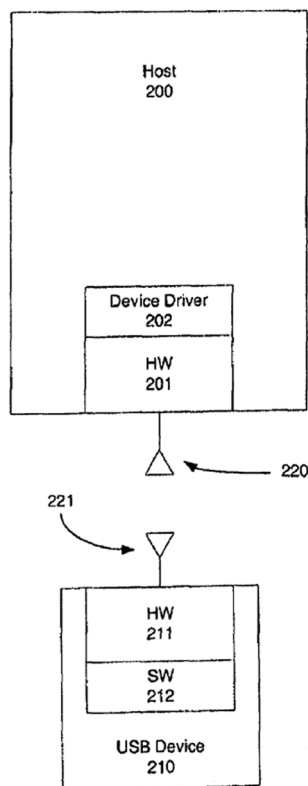


Fig. 2

Ex. 1011, 3:34-39, Fig. 2. The wireless adapters communicate a wireless signal provided by antennae 220, 221, rather than through a wireless cable. Ex. 1011, 3:39-41; Ex. 2004, ¶69.

Christison also described that wired USB devices 310, 320 can be plugged into a device wire adapter (DWA) to be compatible with the USB host. Ex. 1011, 3:48-53, Fig. 3; Ex. 2004, ¶69.

IV. GROUND 1

A. Claim 1 and Claim 12

1. “the base unit being configured to transmit and the first peripheral device being configured to receive first processed video data over the communications network”

The Petition relies only on *Beel* for this limitation. Petition, 23-24. *Beel* does not disclose this limitation. Ex. 2004, ¶¶74, 101-107, *Beel* sought to improve meetings by improving the speed and efficiency of “on-the-fly” presentations by using electronic meeting tools rather than specialized presentation software, and provide the ability to review the events of a meeting through an accurate recording. Ex. 1005, ¶¶113-116. Accordingly, *Beel* describes communications *from* the peripheral device *to* the base unit—not the reverse. Ex. 1005, ¶122 (“the present invention provides an electronic meeting tool for communicating arbitrary media content between different users 37... and one display or projector...in the meeting room 30.”); Ex. 2004, ¶102.

The base node is coupled to a display and adapted to receive media content provided by a user’s processing device. Ex. 1005, ¶123; Ex. 2004, ¶103. The system includes a peripheral device (sometimes referred to as a connection unit), which stores a portable application used to screen scrape and transmit data from the processing device to the display wirelessly. Ex. 1005, ¶¶127-128, 208-212; Ex. 2004, ¶103. The peripheral device may also transmit audio data. Ex. 1005, ¶¶313-316; Ex. 2004, ¶103.

The Petition, relying on ambiguity in the cited paragraph, extends the teachings of *Beel* beyond what it reasonably discloses. Ex. 2004, ¶104. The Petition quotes limited portions of paragraph 71 of *Beel* to allege it discloses a “peripheral device... receiving media content from the network.” Petition, 23 (citing Ex. 1005, ¶71). What is actually described is a software code, stored on the peripheral device, which includes a “portion for receiving media content from the network and *for displaying the media content on the display* in accordance with a set of rules” Ex. 1005, ¶71. Paragraph 71 does not disclose which display is used to display the content. Ex. 1005, ¶71; Ex. 2004, ¶105.

Throughout the remainder of the specification, *Beel* refers to using a set of rules with *the base node*, not the user processing device. Ex. 1005, ¶¶75 (“receiving media content... at the base node and displaying the media content... in accordance with a set of rules”), 123 (“The base node 36 can be adapted to display the received user selected arbitrary media content in accordance with a set of rules”), 132 (“The system also can include a server program 64 adapted to be loaded onto the base node.... The server program 64 may be adapted to allow display in accordance with a set of one or more rules”), 135 (“The system may also include a central display device... [that] may be adapted to allow display... media content in accordance with one or more rules,”) 147-157 (“The base node software has one or more of the following features: Optionally... displaying incoming arbitrary media content in

accordance with a set of one or more rules.”); Ex. 2004, ¶106. In fact, the Petition itself cites to paragraph 71 for identifying communications in the opposite direction, when the first peripheral device receives the third video data from the processing device. Petition, 27-28 (limitation 1l), 28-29 (limitation 1m); Ex. 1002, ¶¶130 (limitation 1l), 131 (limitation 1m); Ex. 2004, ¶106.

Beyond paragraph 71, the Petition cites over fifteen paragraphs without providing any explanation for how they disclose the cited limitation. Petition, 23-24 (citing Ex. 1005, ¶¶50, 56, 75, 88-89, 93, 118-122, 126, 128, 298, 310-311); Ex. 2004, ¶107. Many of the paragraphs actually disclose communications from the processing device to the base node, not the opposite direction the Petition alleges. Ex. 1005, ¶¶75 (“receiving media content... at the base node and displaying... in accordance with a set of rules”), 122 (“the present inventions provides an electronic meeting tool for communicating arbitrary media content between different users 37... and one display or projector...in the meeting room 30.”).

The Petition’s partial quotation of paragraph 71 ignores the purpose and numerous clear teachings of *Beel*, improperly extending ambiguous language beyond what is reasonably taught.

2. “the functional device being configured for first video data to flow into the base unit or first video data is captured in the base unit, the first video data being processed in the base unit to

generate the first processed video data, wherein the first processed video data is sent to the first peripheral device,”

The Petition relies only on *Beel* for this limitation. Petition, 24-25. *Beel* does not disclose this limitation. Ex. 2004, ¶¶75, 108-113. Figure 1a (reproduced below) “shows a meeting room that can be used within embodiments” *Beel* discloses. Ex. 1005, ¶96. In the meeting room 30, multiple participants 37 with processing devices (e.g., laptops) 31 are coupled to peripheral devices (or “connection units”) 47 adapted to communicate media content to a base node 36 connected to a display 44. Ex. 1005, ¶¶117, 119; Ex. 2004, ¶110. Optional equipment in the meeting room includes cameras 39, 40, 41 for recording progress of the meeting, and microphones 39 that can be used to transfer audio to the processing devices 31 and loud speakers attached to the base nodes. Ex. 1005, ¶120; Ex. 2004, ¶110.

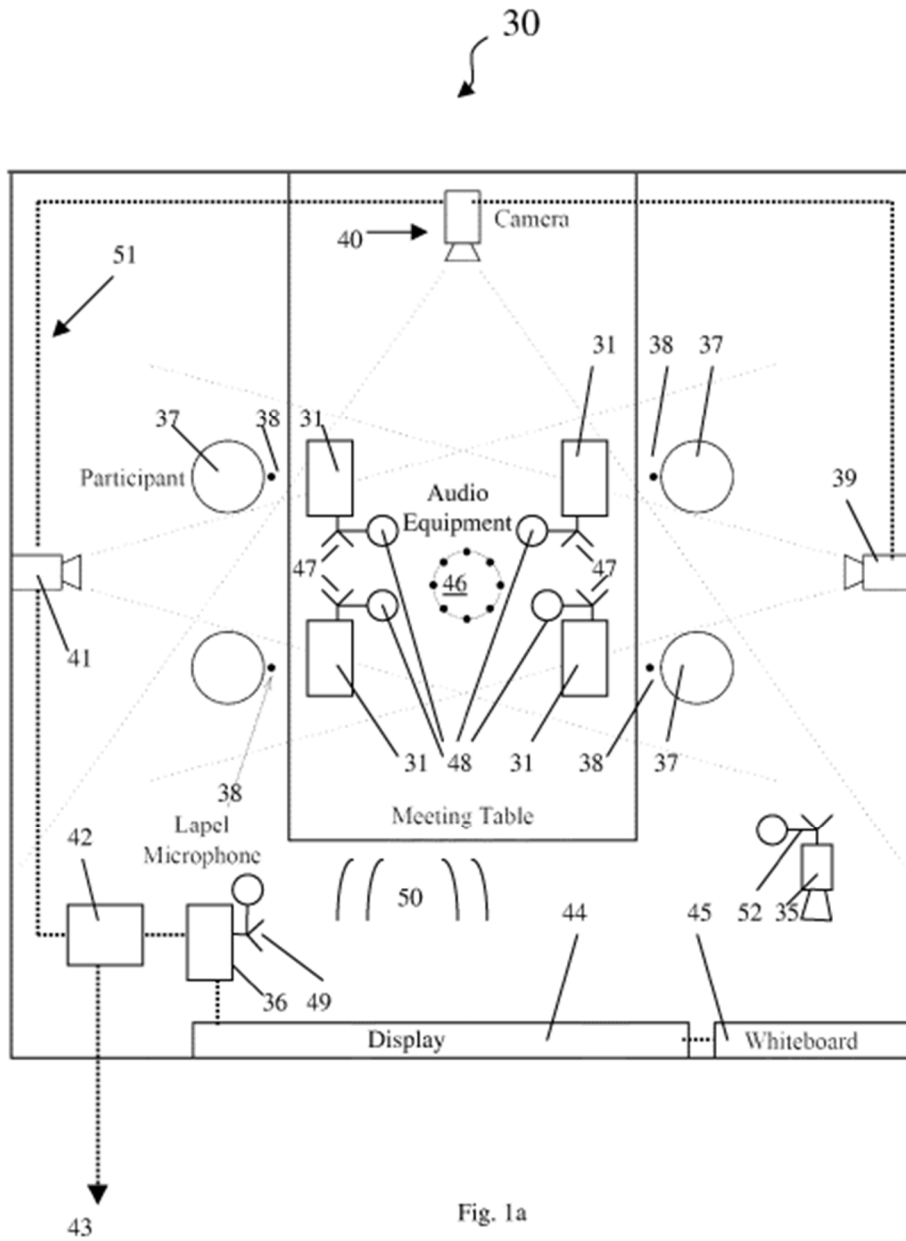


Fig. 1a

Ex. 1005, Fig. 1a.

The cameras can capture the meeting to keep a record of events. Ex. 1005, ¶121; Ex. 2004, ¶111. Maintaining a record of events is a key aspect of the solutions identified in *Beel*. Ex. 1005, ¶¶114, 116, 119.

The Petition improperly relies on these cameras in attempt to render this

limitation obvious. Petition, 24-25. There is no disclosure of the content recorded on the cameras 39, 40, 41 providing video data to the base node which is then sent to the processing device. Similarly, there is no disclosure of “the first video data being processed in the base unit to generate the first processed video data[.]” The cameras are used to capture the meeting events and provide a record with no teaching of the claimed transmission path. Ex. 1005, ¶¶114, 116, 119-121; Ex. 2004, ¶112. The Petition improperly cites paragraph 71, attempting to exploit the same ambiguity above. Petition, 24 (citing Ex. 1005, ¶¶71-72²); *see supra* Section IV.A.1.

The only other camera disclosed in *Beel* and referenced by the Petition is the optional camera 35 which may record entries on a whiteboard 45. Petition, 24 (citing Ex. 1005, ¶119). This camera is not even connected to the base node—instead it is connected to a connection unit that communicates data to the network so that the data can be stored or transmitted to other networks. Ex. 1005, ¶119; Ex. 2004, ¶113. It is not “a functional device...connected to or in a base unit” as required by the preamble and this limitation. Ex. 1001, Cls. 1, 12.

² Notably, paragraph 72 of *Beel* is also cited as allegedly disclosing communications in the opposite direction, for limitation 1n. Petition, 29-30.

3. “the first peripheral device being configured to process the first processed video data received by the first peripheral device to generate second video data,”

The Petition relies only on *Beel* for this limitation. The Petition truncates quotes from *Beel* in attempt to allege obviousness of this element. Rather than the peripheral device receiving the first processed video data from the base unit and processing the data to generate a second video data (as required by the claims of the '347 Patent), “On the peripheral device 32, the video packets are received *at the corresponding plug and play port, e.g. the USB port*” of the processing device. Ex. 1005, ¶321³. Accordingly, any processing performed by the first peripheral device is not on “the first processed video data[.]” Ex. 2004, ¶¶76, 114-115.

4. “the operating system of the processing device being configured to capture the second video data and to make it available through a custom or standard driver to either the host application or a 3rd party application running on the processing device or to other processing devices,”

Beel does not disclose this limitation. Ex. 2004, ¶¶77, 116-118. *Beel* does not disclose any type of video data being received from the base unit. *Supra* Sections IV.A.1-IV.A.2. So, the processing device here does not capture the second video

³ The Petition mistakenly cites to ¶322 of *Beel*, but quotes ¶321. *See* Ex. 1005, ¶322 (“Having been routed over a communications network *to the base unit 33*.”).

data and make it available to any application on the processing device. Ex. 2004, ¶117.

The Petition relies on *Dinka* solely for the limited purpose of “explain[ing] how video data is made available to ‘a 3rd party application[.]’” Petition, 27. Accordingly, it does not remedy *Beel*’s disclosure. Ex. 2004, ¶118.

5. “at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device,”

Beel does not disclose this limitation. Ex. 2004, ¶¶73, 96-100. The term “endpoint” does not appear in *Beel*. See generally Ex. 1005; Ex. 2004, ¶98. The Petition relies on the similarities between Figure 4 of the ’347 Patent and Figure 11 of *Beel* to allege that *Beel* necessarily discloses endpoints, ignoring the lack of such disclosure in *Beel*. Petition, 21. Figure 4 (reproduced below), does not itself identify a single component as an endpoint:

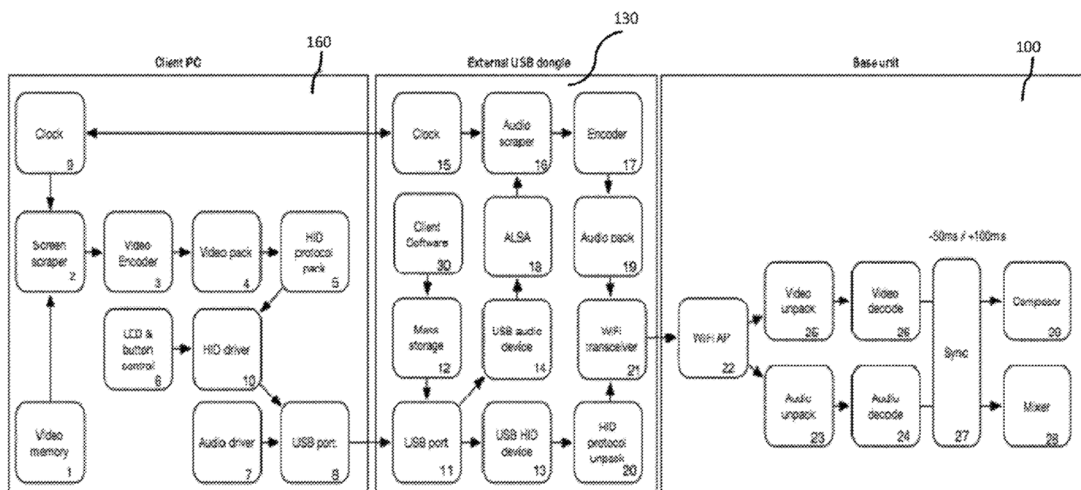


Fig. 4

Ex. 1001, Fig. 4; Ex. 2004, ¶98.

The text accompanying Fig. 4 simply discloses drivers used in screen sharing and audio—it does not suggest that these elements are fixed or configurable endpoints of a peripheral device, as claimed. Ex. 1001, 18:4-9 (“These are fixed and are combination of vendor specific endpoints and a number of standard endpoints and *can be interpreted or understood* as a custom Driver, a default OS driver and/or a host application as has been described with reference to FIG. 4 do screen sharing and audio.”); *see* Ex. 1001, 18:10-20; Ex. 2004, ¶98. In fact, the drivers shown in Fig. 4 are depicted on the *client PC*, not the *external USB dongle*. Ex. 1001, Fig. 4; Ex. 2004, ¶98. Notably, when asked about where *Beel* describes endpoints, Dr. Almeroth only provided citations to his declaration, not *Beel* itself. Ex. 2006, 15:23-16:5, 22:23-23:15.

Further, the Petition points to disclosures in *Beel* that it allegedly teaches an endpoint without consideration of what data the endpoint is associated with. Petition, 21-23. The endpoint is *of the functional device* (i.e., it shares data associated with the functional device via the peripheral device). The Petition merely blockquotes passages from an *alternative* embodiment of *Beel* regarding how “audio is channeled over the communications network[.]” Petition, 22 (citing Ex. 1005, ¶317); Ex. 2004, ¶99. This data is not “of the functional device[;]” the peripheral device acts as an audio out device when connected to the processing device and channels audio data of *the processing device* (not functional device that captures

video data) to the base unit. Ex. 1005, ¶313. The audio data of the processing device is then communicated *to* the physical audio device of the base unit. Ex. 1005, ¶315; Ex. 2004, ¶99. Likewise, Dr. Almeroth provides identical block quotes and merely concludes that such disclose “explains” the claim limitation without providing any expert analysis. Ex. 1002, ¶117. Conclusory statements that merely parrot the Petition do not meet the burden of obviousness. *Bell Semiconductor LLC v. NXP B.V.*, No. 2023-1260, 2024 WL 4984053, at *3 (Fed. Cir. Dec. 5, 2024) (confirming the Board properly rejecting an “expert’s declaration that parrots the language of the petition.”).

Therefore, *Beel*, which does not use the term “endpoint,” does not teach or render obvious “at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device[.]”

a. *Dinka* and *Christison* do not remedy *Beel*’s deficiency

The Petition does not cite *Dinka* for this limitation. *See* Petition, 21-23. Likewise, the Petition relies on *Christison* only to teach the sub-element: “exposed[.]” *Id.*, 22-23. Even if *Christison* teaches the “exposed” sub-element it fails to teach that the endpoint is of the functional device. Ex. 2004, ¶100.

B. Claims 23 and 27

The Petition incorporates by reference its arguments for Claims 1 and 12 for Claims 23 and 27. *See* Petition, 37-40, 40-42. These arguments fail for the same

reasons. *Supra* Section IV.A; Ex. 2004, ¶¶73-78.

C. Claims 2 and 13

Beel does not disclose a base unit that interprets and/or encodes the first processed video data. The base node of *Beel* **decrypts** and **decodes** the software, but it does not interpret and/or encode. Petition, 31 (citing Ex. 1005, ¶155). Moreover, there is no reason why “a POSA would find it obvious... to ‘move’ the code for encoding/encrypting... from the peripheral device onto the base node” as advocated. Petition, 31. *Beel* is directed towards a presentation system and does not disclose communications from the base node to the peripheral device (*see* Section IV.A.1), and the Petition fails to identify any reason why a POSITA would encode the data already received in the base node. Ex. 2004, ¶119.

D. Claims 3 and 14

Beel does not disclose a base unit that enhances, mixes, multiples and/or encrypts the first video data. The Petition wrongly identifies executable software stored on the peripheral device and executed on the processing device (not the base unit) as providing this feature. Ex. 1005, ¶¶71-72. Moreover, Dr. Almeroth concludes that Auto-composing different media streams is the same as “mixing” or “multiplexing” without any evidence. Ex. 1002, ¶139; Ex. 2004, ¶120.

E. Claims 4, 5, 15 and 16

Beel does not disclose a peripheral device that decodes and/or interprets or demultiplexes and/or decrypts the first processed video data. *Supra* Section IV.A.1.

Moreover, the Petition alleges without evidence that removing HID protocol headers renders obvious “decode and/or interpret” and “demultiplexes, and/or decrypts” as claimed. Petition, 32; *see* Ex. 1001, Cls. 4, 5, 15, 16. This unsubstantiated conclusion is not enough to carry the Petition’s burden. Ex. 2004, ¶121.

F. There is No Motivation to Combine *Beel*, *Dinka*, and *Christison*

The Petition fails to articulate any reasonable motivation to combine or provide for a coherent combination; rather, the Petition simply identifies various discrete teachings and alleges that *if* combined, the references would teach the invention of the ’347 Patent. Contrary to the Petition’s allegations, *Beel* and *Dinka* provide for fundamentally different modes of operation which would not, and in fact could not, be combined by a POSITA. The Petition fails, however, to identify a persuasive motivation to combine the three disparate references to arrive at the *Beel-Dinka-Christison* combination. *Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064, 1073 (Fed. Cir. 2015) (“[O]bviousness concerns whether a skilled artisan not only *could have made* but *would have been motivated to make* the combination or modification”) (emphasis in original).

1. *Dinka* Teaches Away From the Claimed Subject Matter

The ’347 Patent recognized that portable devices (e.g., laptops and mobile devices) are disadvantaged by low quality integrated functional devices. Ex. 1001, 1:22-25, 1:41-46, 1:47-52. The system disclosed in the ’347 Patent provides higher

quality functional devices (more specifically, webcams) to these portable devices by wirelessly communicating to a base unit connected to higher quality functional devices. Ex. 1001, 1:56-59, 10:39-51; Ex. 2004, ¶80. In contrast, *Dinka actively discourages* and therefore teaches away from, the use of portable devices for virtual meetings and instead advocates for packet-based communications to be integrated in a television or set-top box, creating the special hardware that Dr. Almeroth is familiar with. Ex. 1006, 2:4-30; Ex. 2006, 26:1-27:9; Ex. 2004, ¶¶71, 79, 81.

The Challenged Claims of the '347 Patent require these very portable devices. Ex. 1001, Cl. 1, *see also id.*, Cl. 12, Cl. 23, Cl. 27, 8:54-64; Ex. 2004, ¶82. Fig. 5 shows an example arrangement of processing devices as used in a meeting with a unified communication in progress according to embodiments of the '347 Patent:

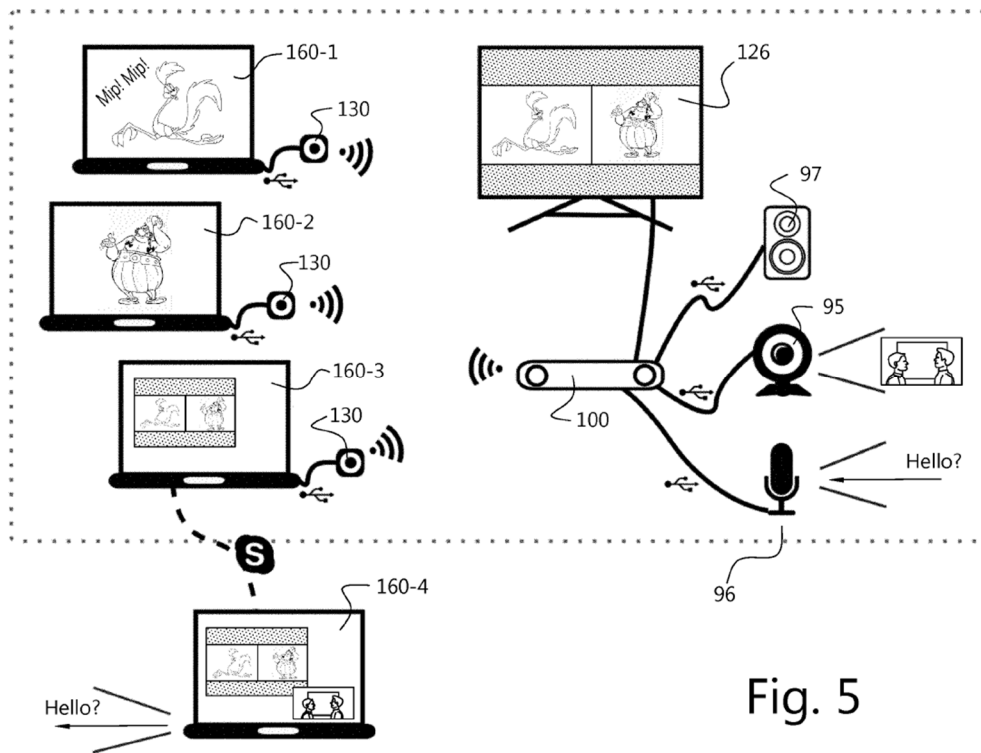


Fig. 5

Ex. 1001, Fig. 5, 5:53-55; Ex. 2004, ¶83.

In the '347 Patent, processing devices 160-3 and 160-4 share the unified communication call. Ex. 1001, 19:22-29; Ex. 2004, ¶83. The unified communication protocol on the processing devices 160-3 can interact with the USB endpoints available on the first peripheral device 130 like the camera 95, microphone 96 and speaker 97 connected to the base unit 100. Ex. 1001, 19:31-37; Ex. 2004, ¶83. The claimed process provides for use of higher quality webcam connected to the base unit and display 126 with the processing device 160-3, rather than relying on low quality options of the processing device 160-3 during the virtual meeting. Ex. 1001, 1:22-25, 1:49-52, Cl. 1.

Dinka actively criticizes, discourages, and discredits the solution presented by the '347 Patent. *Polaris Indus. v. Arctic Cat Inc.*, 882 F.3d 1056, 1068-69 (Fed. Cir. 2018) (reversing a rejection of a teaching away theory because the inquiry is not “what a skilled artisan would have been *able* to do, [but] rather than what a skilled artisan would have been *motivated* to do at the time of the invention”); *Chemours Co. FC, LLC v. Daikin Indus., Ltd.*, 4 F.4th 1370 (Fed. Cir. 2021) (holding the prior art reference teaches away when it explicitly discourages a skilled artisan from modifying a prior art reference in the manner necessary to reach the claimed invention.); *Spectralytics, Inc. v. Cordis Corp.*, 649 F.3d 1336 (Fed. Cir. 2011) (teaching away does not require a prior reference to foresee and explicitly reject the

applicant's invention); Ex. 2004, ¶84.

Dinka expressly teaches that while packet-based communications “are most commonly accessed using a personal computer[,] [t]his has the *disadvantage* that the user must be sufficiently technically competent to download, install, and operate the packet-based communication client software on their personal computer, which provides a barrier to the take-up.” Ex. 1006, 2:4-8; *see also id.*, 2:8-12; Ex. 2004, ¶84.

Dinka provides call hosting capabilities on a central device (e.g., television or set-box) in attempts to overcome the problems with users using their own device on these calls. Ex. 1006, 2:19-25, 2:34-38; Ex. 2004, ¶85. *Dinka's* television includes embedded VoIP calling functionality, thereby removing the need for a user to rely on its own laptop to participate in VoIP calls. Ex. 1006, 7:17-21. Rather than providing better functional devices to personal devices, *Dinka* discourages the use of such devices (the very devices used by '347 Patent to host calls) and teaches implementing hosting functionality into special purpose televisions. Ex. 2004, ¶86. Accordingly, *Dinka* teaches away from the claimed subject matter of the '347 Patent.

2. The Petition Fails to Establish a POSITA Would Have Been Motivated to Combine *Beel* and *Dinka*

A POSITA would not consider implementing teachings of *Dinka* into *Beel*. Ex. 2004, ¶¶72, 87. As described *supra* Section IV.F.1, *Dinka* teaches away from systems that host unified communications calls on a laptop computer or mobile

device. *Spectralytics, Inc.*, 649 F.3d at 1343-44 (pervasive general preference can amount to teaching away). *Beel*, however, is solely directed towards providing greater features to laptops or mobile devices, like wirelessly presenting audio and display data in a meeting. Compare Ex. 1006, 2:15-18; Ex. 1005, ¶40; Ex. 2004, ¶88. *Beel* and *Dinka* provide competing, and diametrically opposed, solutions to address the limited functionality of laptops and computers. Ex. 2004, ¶89. A POSITA would not be motivated to combine these approaches.

3. The Petition’s Proffered “Motivation” Arguments Fail

The Petition’s proffered motivations are also insufficient. Ex. 2004, ¶¶90-95. With respect to *Beel* and *Dinka* the Petition’s identification of general similarities is insufficient. Petition, 16-18; *William Wesley Carnes, Sr., Inc. v. Seaboard Int’l Inc.*, IPR2019-00133 Paper 10, 18 (PTAB May 8, 2019) (“That statement of similarity, however, does not constitute an articulate reasoning with rational underpinning as to why a POSITA would combine elements of one reference with another, and why a POSITA would modify the teachings of the references to arrive at the claimed invention.”). The Petition concludes that a POSITA would have been motivated to combine *Beel* and *Dinka* to “improve similar systems in the same manner” without articulating what the alleged improvement would be, why that improvement would be desired, or whether that change would be made with any expectation of success. See Petition, 17. Such conclusory statements regarding an unknown improvement

are especially unpersuasive in light of *Dinka* itself teaching away from the claimed subject matter. *Supra* Section IV.F.1.

Dr. Almeroth also fails to articulate any specific improvement that would motivate a POSITA to combine the references. Instead, Dr. Almeroth appeals to general similarities between systems and concludes they would be combined without any relation between the combination and the apparent improvement. Ex. 1002, ¶109; Ex. 2004, ¶¶91-92.

In reality, the identified similarity is also manufactured. The Petition states “Beel similarly discloses “electronic meeting systems” and “web conferencing systems.” Petition, 17 (Ex. 1005, ¶¶85-89). However, this citation to four separate definitions describing different types of systems and technologies in *Beel* is not tied to any actual reason or teaching in *Beel* or the prior art. Ex. 1005, ¶¶85-89. Tellingly, these definitions note that certain systems are distinguishable. *See* Ex. 1005, ¶85 (““Electronic meeting systems’ (EMS) **need to be distinguished** on the one hand from classic groupware, on the other from web conferencing systems.... EMS **should be distinguished** from systems with which it is possible to show the contents of an individual computer screen on a remote display with multiple users at the same time.”).

Additionally, the Petition draws a false equivalence from the fact that the ’347 Patent references Skype as a Unified Communications system or tool in its

definitions section and concludes that a POSITA would be motivated to combine *Beel* (a Barco-owned patent) with *Dinka* (a Skype-owned patent) without explanation. Petition, 16-17. The fact that the Skype platform is referenced in disclosure of the '347 Patent does not explain why a POSITA would modify an electronic presentation tool which does not reference Skype (*Beel*) and a television with embedded hardware for conducting web conferencing calls (*Dinka*). Ex. 1005, ¶¶39, 41; Ex. 1006, 1:13-15, 7:17-21; Ex. 2004, ¶92. This impermissible, hindsight-driven analysis is the basis for Petition's challenge.

Likewise, the proposed motivation to combine *Christison* with either *Beel* or *Dinka* is insufficient. Ex. 2004, ¶93. The Petition alleges that “[a] POSA would have recognize that connecting wireless functional devices to computers was well known, and that Christison teaches one efficient example by presenting wireless USB devices as ‘native devices.’” Petition, 27. Yet again, merely alleging that content or elements were known independently is not sufficient to establish obviousness. *KSR Int. Co. v. Teleflex Inc.*, 550 U.S. 398, 418-19 (2007) (“[A] patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art.”).

The Petition does not explain *how* or *why* this combination would be motivated. In fact, the Petition does not even conclude that a POSITA *would* actually make the combination to *improve* the primary reference, rather it simply

alleges that the combination *could have* been made. Petition, 16-17 (“Beel, Dinka, and Christison *could have* been combined by...”); *Belden*, 805 F.3d at 1073 (“[O]bviousness concerns whether a skilled artisan not only *could have made* but *would have been motivated to make* the combination or modification of prior art to arrive at the claimed invention.”) (emphasis in original). Such arguments are insufficient to establish a motivation to combine. *Virtek Vision International ULC v. Assembly Guidance Systems, Inc.*, 97 F.4th 882, 888 (Fed. Cir. 2024) (“The mere fact that these possible arrangements existed in the prior art does not provide a reason that a skilled artisan *would have substituted* [an element of one reference with the elements of another].”).

Further, the Petition does not articulate any coherent combination that teaches the claimed invention, but instead attempts to rely indiscriminately on various distinct prior art elements that supposedly could be combined to argue the claims of the ’347 Patent are obvious. Petition, 22-23 (“Petitioner relies *optionally* on Christison, which renders obvious configuring descriptor fields, which is applicable to USB devices.”); *see* Ex. 1002, ¶¶112, 136; Ex. 2004, ¶94. This lack of a proper motivation to combine is emblematic of the Petition’s overall allegation that each limitation was *known*, not that the claims of the ’347 Patent were *obvious*. *Virtek*, 97 F.4th at 888 (“It does not suffice to simply be known. A reason for combining

must exist.”). The Petition thus fails to demonstrate that a POSITA would have been motivated to make the proposed combination and must be rejected.

V. GROUND 2

A. Claim 1 and Claim 12

1. “a first peripheral device being configured to be coupled to the processing device via a generic communications protocol

The Petition does not articulate what transmission path (the peripheral device transmitter of *Kaplan* or integrated transmitter of *Van de Laar*) is used to communicate between the claimed devices, seemingly cherry picking teachings without regard to the distinct teachings of the two references. Ex. 2004, ¶¶124, 144-155. The Petition states a “POSA would have been motivated to modify the receiver and data transmission system of Kaplan [] with Van de Laar’s WDH to improve usability and connected multiple wireless devices and access and use functional device(s) in a unified communications.” Petition, 47. However, it is unclear how *Kaplan*’s system would be modified by *Van de Laar*’s system, if at all. Ex. 2004, ¶145.

Van de Laar and *Kaplan* teach systems for wireless connectivity through very different protocols to extract different benefits. Ex. 2004, ¶¶146-150. *Kaplan* describes transmitting video content using a peripheral device transmitter which connects to a USB port of a computer. Ex. 1008, Abstract, ¶17. The receiver

includes audio-visual outputs and connects to a display. Ex. 1008, ¶16. *Kaplan* does not describe data going from the display or the receiver to the computer.

The system also includes a remote control which controls the playback of video on the display. Ex. 1008, ¶19. Together, these components provide video from a computer to a display device. Ex. 1008, ¶19; Ex. 2004, ¶146. Figure 2 (reproduced below) below shows the remote control 130, receiver 110 connected to a display device 210, and transmitter 120 connected to a computer 220:

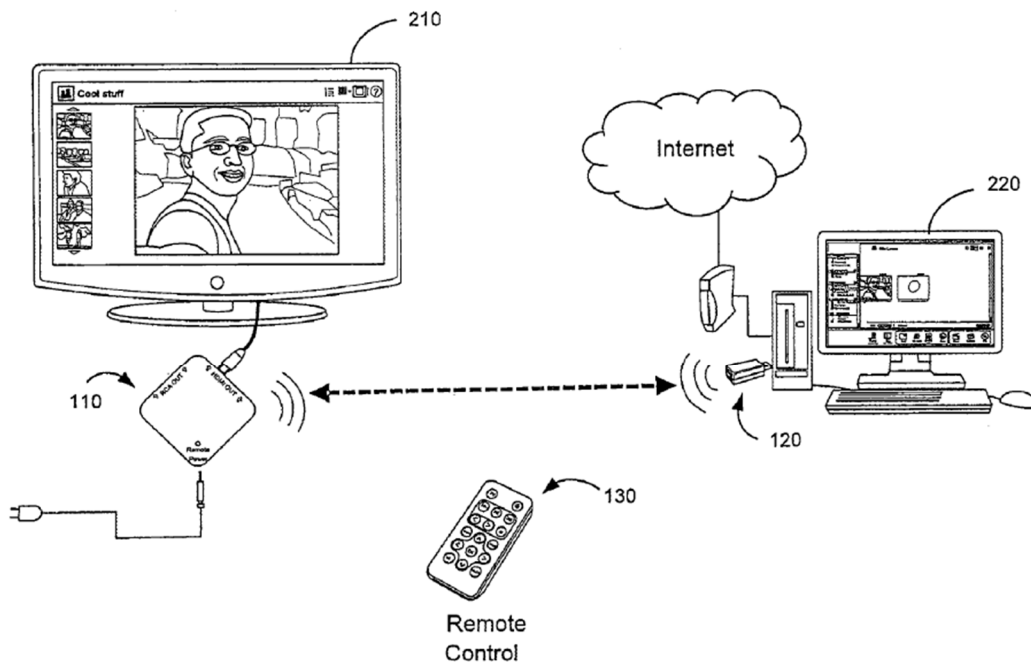


FIG. 2

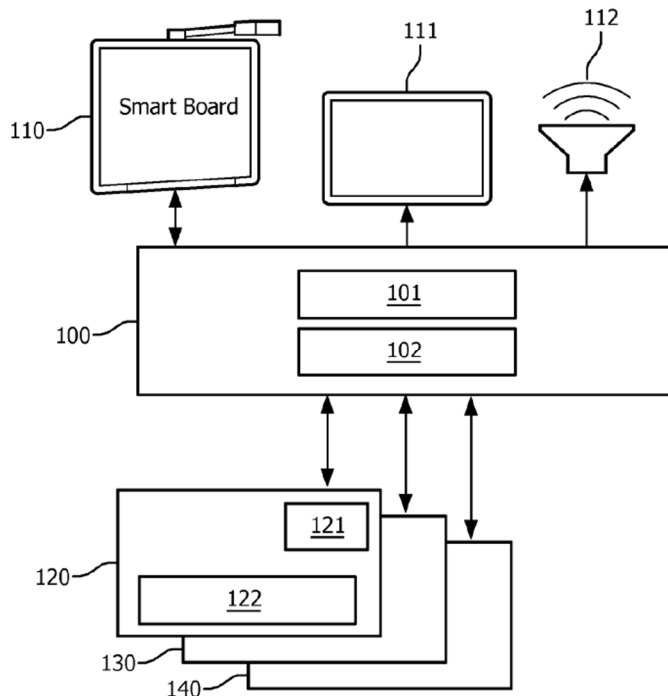
Ex. 1008, Fig. 2, ¶21.

Van de Laar, conversely, provides a wireless docking system that enables a “dockee” to wirelessly share A/V peripherals. Ex. 1007, ¶9; Ex. 2004, ¶148. A “dockee” in *Van de Laar* is a mobile device. Ex. 1007, ¶¶6, 72. The system includes

a wireless docking host (WDH) coupled to peripherals for rendering audio or video data and capable of wireless communication with dockees. Ex. 1007, ¶¶72, 74; Ex. 2004, ¶148. The docking process provides connection to primary dockees and secondary dockees where primary dockees gain control of at least one peripheral device to render AV data, while secondary dockee devices only receive the rendered AV data. Ex. 1007, ¶¶78, 82; Ex. 2004, ¶149. *Van de Laar* does not include a peripheral device that connects to a processing device to provide communications over the wireless communications network; it uses the dockees integrated transmitter. Ex. 1007, ¶76, Fig. 1; Ex. 2004, ¶150.

The Petition relies on both the integrated dockee communication unit of *Van de Laar* and the USB transmitter of *Kaplan*. Ex. 2004, ¶¶152-155. In addition to its allegation that a “POSA would have been motivated to modify the receiver and data transmission system of *Kaplan* [] with *Van de Laar*’s WDH to improve usability and connected multiple wireless devices and access and use functional device(s) in a unified communications” it is unclear which communication method is relied upon. Petition, 47; Ex. 2004, ¶151. *Even if* Petitioner alleges a POSITA would modify *Kaplan* with *Van de Laar*’s communication technique, there is no articulation of *why* a POSITA would be motivated to make the change. *See infra* V.A.4.

The dockee communication unit 121 is not a peripheral device—it is depicted as integrated into the dockee 120:



Ex. 1007, ¶76; Ex. 2004, ¶150. So, the dockee communications unit of *Van de Laar* cannot teach “the first peripheral device” of Claim 1.

2. “at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device,”

Van de Laar does not disclose this limitation. Ex. 2004, ¶¶125, 156-158. As explained in Section V.A.1, *Van de Laar* does not disclose the peripheral device. So, *Van de Laar* cannot disclose endpoints exposed on the first peripheral device.

Reliance on the data sources and data sinks of Miracast is misplaced. See Petition, 54-55. *Van de Laar* explains when using Miracast, the dockee (i.e., the mapped *processing device*) functions as a source and the wireless docking host (i.e., the mapped *base unit*) serves as a sink or a source. Ex. 1007, ¶126; Ex. 2004, ¶158. However, there is no explanation or motivation to import this functionality into the

transmitter of *Kaplan*. Ex. 2004, ¶158. Teachings regarding the dockee and wireless docking station should not be improperly attributed to a USB transmitter, especially as the source and sink are with respect to *Miracast*, a protocol which provides wireless communication directly between two devices, rather than using an intermediate (first peripheral) device communicating over a generic communications protocol to the processing device as claimed. Ex. 1001, Cl. 1; Ex. 1007, ¶126; Ex. 2004, ¶158. Moreover, there is no discussion of the data of the Miracast source or sink storing or emitting data of *the functional devices*. Instead, the Petition’s allegation merely amounts to data sources and sinks in certain network communications (e.g., Miracast) exist.

Christison and *Kaplan* do not remedy *Van de Laar*’s insufficiency. The Petition does not rely on *Kaplan* for this limitation. Petition, 48-50. Even if *Christison* teaches “exposed or made available,” the Petition still fails to identify how the combination teaches “the first peripheral device having... at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device [.]” Ex. 2004, ¶157.

3. “the base unit being configured to transmit and the first peripheral device being configured to receive first processed video data over the communications network,”

Van de Laar does not disclose its wireless docking host (WDH) transmitting video data and the dockee communications unit receiving data over the

communications network. Ex. 2004, ¶¶126, 159-165. Instead, the Petition incorrectly identifies communications sent *from* the dockee *to* the WDH. Ex. 2004, ¶160.

Van de Laar identifies the desirability of systems that enable sharing content. Ex. 1007, ¶80 (“there’s a need to exchange information collaborate, share meeting results such as meeting notes, presentations, whiteboard or smartboard contents.”); Ex. 2004, ¶161. Notably, in the same passage *Van de Laar* identifies a number of systems which perform these tasks, but do not render obvious the claims of the ’347 Patent. Ex. 1007, ¶80 (referring to video cables, and Wi-Fi Miracast); Ex. 2004, ¶161. These elements are all focused on sharing media from a dockee (e.g., a laptop) to a central display, not the other way around. Ex. 2004, ¶161.

This is also consistent with the other portions of *Van de Laar*. Ex. 1007, ¶¶92 (“the WDH distinguishes the multiple dockees between primary dockee and secondary dockees, for example a presenter and attendees.”); 115 (“A primary dockee/presenter P can use the WDH peripherals for giving a presentation to multiple attendees.... The WDH provides an A/V stream representing the output being sent by presenter P to the WDH peripherals.”); 123 (“The WDH may be configured to provide a video stream representing the output that is sent by the primary dockees to the one or more display peripheral.”). The Petition fails to identify any instances of video data being communicated from the WDH to the

primary dockee. Ex. 2004, ¶162.

Further, the Petition wrongly relies on features of the secondary dockee for this limitation. Petition, 51 (“The secondary dockee receives the ‘first processed video data’ via the communication unit 121.”) (citing Ex. 1007, ¶55). *Van de Laar’s* system includes two distinct dockees: a primary dockee and a secondary dockee. Ex. 1005, ¶¶55, 77; Ex. 2004, ¶163. The primary and secondary dockee devices have different access levels and capabilities with respect to the WDH and peripheral devices. Ex. 1005, ¶77. These two distinct components are relied on indiscriminately by the Petition, without rationale for modifying or moving functionality across devices. Ex. 2004, ¶¶163-164.

For example, the Petition relies on communications to the secondary dockee for limitation g, i, k, and l. Petition, 51, 53-55. The Petition relies on communications from the primary dockee for at least limitations l, m, and n. Petition, 55-58. The primary dockee and secondary dockee are specifically designed to have different features and functions:

The inventors have seen that *the above problems* of interference between dockees when attempting to dock to a same peripheral *are overcome by distinguishing at least two types of dockees*, and providing control over the peripheral to only a primary dockee. The secondary dockee gets a different, restricted access to the peripheral, or, in effect, a different peripheral function is presented to the secondary dockee to represent the access to the original peripheral. For example,

the *primary dockee gets access to a display*, whereas *the secondary dockee is enabled to monitor the output on the display by receiving a video data stream of a peripheral similar to a camera function*.

Ex. 1007, ¶55. It is improper to rely on the primary and secondary dockees indiscriminately. See IPR2025-00597 (Paper 11), 26, 32 (“Patent Owner argues that... [Petitioner] ‘draws upon the primary dockee and secondary dockee indiscriminately.’ We share Patent Owner’s concern.”). Therefore, *Van de Laar* does not teach this limitation.

The Petition does not rely on *Kaplan* or *Christison* for this limitation. Petition, 50-51. *Kaplan* notes that “the transmitter 120, which may also be a transceiver, includes the ability to both transmit and receive data from a matched transceiver” but provides not teachings of the transmitter actually receiving video data from the receiver. Ex. 1008, ¶17. So, *Kaplan*’s disclosure is also insufficient. Ex. 2004, ¶165.

4. “the first peripheral device being configured to process the first processed video data received by the first peripheral device to generate second video data”

The Petition does not meet its burden that this limitation is taught by *Van de Laar*. Ex. 2004, ¶¶127, 166-167. As explained in Section V.A.1, *Van de Laar* does not disclose a first peripheral device. Moreover, the Petition merely concludes that the communication unit 121 shares content, but provides no evidence that the communication unit 121 processes the video data. Petition, 56-57 (citing Ex. 1007, ¶¶124-126). For example, the Petition identifies that the “secondary dockee device

is enable to receive the AV data as rendered via the peripheral” where the WDH grants the primary dockee write access to said peripheral. Ex. 1007, ¶56. There is no allegation of any processing beyond the “scaled and/or transcoded, representation of the primary AV data” provided by the WDH to the dockees. Ex. 1007, ¶56; Ex. 2004, ¶167; *see also* Ex. 1007, ¶¶93, 115. Further, the host device may also simply provide “read access... to the original, full resolution AV data[.]” Ex. 1007, ¶56.

5. “the operating system of the processing device being configured to capture the second video data and to make it available through a custom or standard driver to either the host application or a 3rd party application running on the processing device or to other processing devices”

- a. Host application or a 3rd party application

The Petition relies on *Van de Laar*’s mention of Skype. Petition, 54 (citing Ex. 1007, ¶128). However, *Van de Laar* does not utilize Skype as claimed. Ex. 2004, ¶¶128, 168-175.

Van de Laar discloses a system where a wireless docking station or wireless docking host enables a mobile device (a dockee) to access a set of peripherals locally attached to the wireless docking host. Ex. 1007, ¶6; Ex. 2004, ¶169. Figure 3 (reproduced below) shows an example of the communication structure in the wireless docking system. Ex. 1007, ¶67. The wireless docking host (WDH or host) 300 has wireless communications with a primary dockee 320 and a secondary dockee. Ex. 1007, ¶124; Ex. 2004, ¶¶170-171. The WDH receives AV data via a

unicast link 311 from the primary dockee 320 and transfers the AV data via a broadcast link 312 to the secondary dockee 330. Ex. 1007, ¶124; Ex. 2004, ¶170. The primary and secondary dockees also communicate directly via a unicast link 310. Ex. 1007, ¶124. The host 300 has a layer that includes a Wi-Fi Miracast (WFM) sink, a WFM source, an interactive activity engine (IAE) server, and a DHCP server function. Ex. 1007, ¶124; Ex. 2004, ¶170. The host's 300 WFM sink receives data from primary dockee's 320 WFM source, and the host's 300 WFM source provides data to the secondary dockee's 330 WFM sink(s). Ex. 1007, ¶124. So, the WFM source of the host 300 represented as a peripheral device to the secondary dockee 330 WFM sink. Ex. 1007, ¶124.

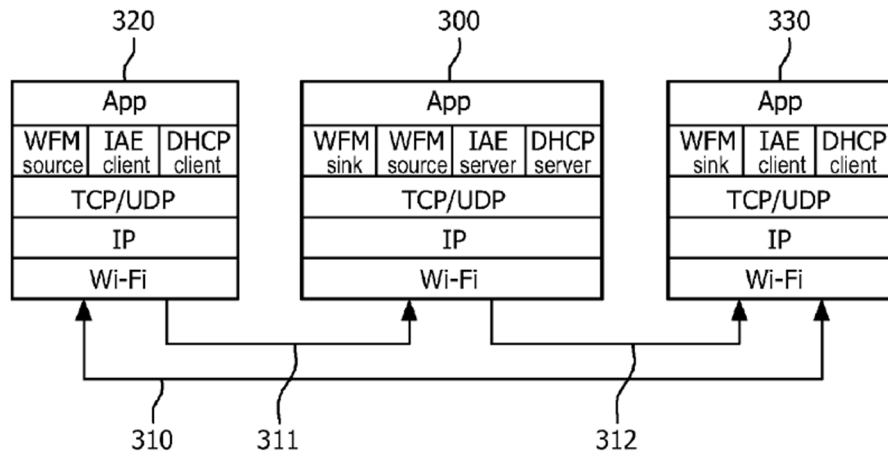


FIG. 3

Ex. 1007, Fig. 3.

The primary dockee 320 runs a docking application using WFM over IP and connects to the host, and the primary dockee functions as a WFM source. Ex. 1007,

¶126; Ex. 2004, ¶171. The host 300 functions as a WFM source and sink, and forwards the packets in broadcast modes to the secondary dockee(s) 330. Ex. 1007, ¶126. The secondary dockee(s) receive the packets as a WFM sink. Ex. 1007, ¶126; Ex. 2004, ¶171. In this way, the data from the primary dockee 320 is shared to the secondary dockee 330 via the wireless docking host. Ex. 2004, ¶¶169-171.

Van de Laar goes on to explain “[i]n **another embodiment**, the WDH may enable primary dockees to provide output to the WDH and/or its audio peripherals through an audio stream between the dockee and the WDH. This may be based on... **Skype**[.] Ex. 1007, ¶128. In other words, rather than sharing communicating AV data from the WFM source of the primary dockee 320 to the WFM sink of WDH 310 via Miracast, a Skype protocol is used. Ex. 1007, ¶128; Ex. 2004, ¶172. There is no other disclosure of Skype in *Van de Laar*.

The use of Skype as taught by *Van de Laar* is to communicate between the primary dockee (an alleged processing device) to the WDH (the alleged base node) which then transmits that data to a secondary dockee (a separately alleged processing device), **not** between the primary and secondary dockees or other personal device. Ex. 1007, ¶128; Ex. 2004, ¶173. There is no disclosure of secondary dockees ever sending audio or audiovisual data over a unified communications call—the secondary dockee is a data sink. Ex. 1007, ¶128; Ex. 2004, ¶174. Accordingly, *Van de Laar* does not teach this limitation. See Ex. 1001, Cl. 1.

Further, the use of Skype is an alternative to using Miracast. *See* Ex. 1007, ¶128. The Petition relies on Miracast throughout its obviousness challenge. Petition, 48 (limitation 1f), 55 (limitation 1k) 56 (limitation 1l) 64 (Claims 17, 24, and 31). There is no explanation how or why *Van de Laar* would be implemented to use Skype to “enable primary dockees to provide output to the WDH and/or its audio peripherals” and simultaneously use WiFi Miracast “to make [the peripherals] functionality available through the wireless network to other devices[.]” Ex. 1007, ¶¶73, 124, 128; Ex. 2004, ¶174.

b. Custom or standard driver

Ground 2 provides no teachings of a driver whatsoever. The word “driver” does not appear in either *Kaplan* or *Van de Laar*. *See generally* Ex. 1007; Ex. 1008. The Petition states “[a] POSA would recognize the secondary dockee captures this data stream and makes it available through its driver and application to ‘monitor.’” Petition, 54-55 (citing Ex. 1002, ¶¶238, 269). Dr. Almeroth concludes that *Van de Laar* would make use of drivers associated with Wi-Fi Serial Bus and Wi-Fi Miracast, with no additional support beyond *Van de Laar* (which again, does not mention drivers). Ex. 1002, ¶239. As it is Petitioner’s burden to establish where the prior art discloses each claim element, and it has not done so, this failure is fatal to this Ground. Ex. 2004, ¶175.

For a separate limitation, the Petition asserts that *Van de Laar* “necessarily or

at least obviously includes drivers.” Petition, 53 (citing Ex. 1002, ¶199). This allegation relies on disclosure of drivers in the ’347 Patent, and their association with operating systems. Moreover, it is not enough to merely conclude that “drivers exist” to render the challenged limitation is obvious. Accordingly, the Petition fails with respect to both Claims 1 and 12. Ex. 1001, Cls. 1.

6. “wherein third video data, received from the host application and/or from the 3rd party application running on the processing device, is sent to an endpoint of the first peripheral device via a standard generic driver,”

The Petition again relies on *Van de Laar*’s mention of Skype, now being used on the secondary dockee. Petition, 56. This is flawed for multiple reasons. Ex. 2004, ¶¶129, 176-177.

Preliminarily, the Petition’s reliance entirely ignores the use of Skype disclosed in *Van de Laar*. *Supra* Section V.A.5.a. Additionally, the Petition relies on the primary dockee’s function, despite arguing it is the secondary dockee’s function. Petition, 55 (citing Ex. 1007, ¶59). This is improper as described in Section V.A.3. There is also no basis to conclude that both the primary dockee and the secondary dockee are participants in the same Skype call. Ex. 2004, ¶177. Dr. Almeroth did not take a specific position as to whether the primary dockee or the secondary dockee or both participate in the Skype call. Ex. 2008, 40:9-19. Likewise, there is no basis to conclude that both the primary dockee and secondary dockee are connected to the same “first peripheral device.”.

This limitation is emblematic of the Petition. Not only does the Petition extend limited disclosure in *Van de Laar* and *Kaplan* beyond what the references reasonably disclose, it also relies on isolated phrases separate and apart from the context they occupy in the system. The mere presence of a word or concept in a reference does not render Patent Owner's claims obvious. For example, the Petition fails to articulate whether the primary dockee *or* the secondary dockee is running Skype while connected to a "base unit" by either the integrated dockee communications unit of *Van de Laar* *or* the wireless transmitter of *Kaplan*, and which of the primary dockees or secondary dockees is connected to the wireless transmitter (if in the combination at all). This failure is fatal given the specifics of the communication path and the transmission of modified data along that path by different devices.

7. "the first peripheral device receiving the third video data and processing the third video data to form second processed video data, and"

Van de Laar does not disclose this limitation. Ex. 2004, ¶¶130, 178-179. The Petition does not rely on *Kaplan* or *Van de Laar* for this limitation. Petition, 56-57. As explained in Section V.A.1, *Van de Laar* does not disclose a first peripheral device. Further, the Petition identifies the WFM packets as the second processed video data. Petition, 56-57. The only disclosure of WFM packets in *Van de Laar* is "to allow the secondary dockee(s) to function as a WFM sink the WDH should

forward the WFM packets in broadcast mode.” Ex. 1007, ¶126. Notably, the Petition relies on this same disclosure to allege *Van de Laar*’s first video data is interpreted and/or encoded in the *base unit*. Petition, 58 (citing Ex. 1007, ¶126). The Petition does not meet its burden that the first peripheral device processes the third video data to form second processed video data by identifying where the *WDH* (not peripheral device) communicates WFM packets. Ex. 2004, ¶179.

B. Claims 23 and 27

The Petition incorporates by reference its arguments for Claims 1 and 12 for Claims 23 and 27. *See* Petition, 66-68, 69-71. These arguments fail for the same reasons. *Supra* Section IV.AV.A; Ex. 2004, ¶¶124-130.

C. Claims 2 and 13

Kaplan and *Van de Laar* do not disclose the base unit interpreting and/or encoding. First, the Petition does not establish how video processing, buffering, and storage renders obvious interpreting or encoding. Petition, 58 (citing Ex. 1008, ¶27). The Petition also relies on the same disclosure to argue these processes are performed in the peripheral device. Petition, 59 (citing Ex. 1008, ¶27). However, it is clear that these processes or tasks are “divid[ed]... between the computer 220, the transmitter 120, and the receiver 110.” Ex. 1008, ¶27. In other words, not all of these processes would be performed in both the receiver and transmitter in *Kaplan*. Ex. 1008, ¶27; Ex. 2004, ¶180.

The Petition relies on the transmission on WFM packets from the WDM to the secondary dockees as rendering obvious interpreting or encoding. Petition, 58 (citing Ex. 1007, ¶126 (“to allow the secondary dockee(s) to function as a WFM sink the WDH should forward the WFM packets in broadcast mode.”)). Notably, the Petition also relies on the same disclosure for features of the peripheral device. Petition, 56-57 (citing Ex. 1007, ¶126).

D. Claims 3 and 14

The Petition merely incorporates earlier arguments by reference for this limitation. *See* Petition, 59. There is no explanation in these sections how *Van de Laar* or *Kaplan* disclose data that is enhanced, mixed, multiplexed, and/or encrypted in the base unit. Ex. 2004, ¶181.

E. Claims 5 and 16

Van de Laar does not disclose that the first peripheral device demultiplexes and/or decrypts the first processed video data. For example, the Petition incorrectly alleges that mixing and multiplexing are the same processes. *See* Petition, 60; Ex. 2004, ¶182.

F. Claim 28

The Petition incorporates by reference its arguments for Claims 1 and 12 for Claim 18. *See* Petition, 66-68, 69-71. These arguments fail for the same reasons. *See supra* Section IV.AV.A. Ex. 2004, ¶183.

G. There is No Motivation to Combine *Kaplan*, *Van de Laar*, and *Christison*

1. *Van de Laar* and *Kaplan* teach incompatible communication methods

In addition to failing to identify the communication mode of the combination, (see *supra* Section V.A.1) a POSITA would not be motivated to combine the cited references due to their competing approaches. Ex. 2004, ¶¶123, 132.

One key benefit taught by *Kaplan* is its “walled garden” approach. *Kaplan*’s transmitter and receiver are pre-paired to form a walled garden system where exactly one transmitter is paired with exactly one receiver. Ex. 1008, ¶53; Ex. 2004, ¶113. By being pre-paired prior to shipment, the user does not need to configure the devices and the user experience is more streamlined. Ex. 1008, ¶21; Ex. 2004, ¶133. Instead, “the user just plugs-in the devices and [they] operate as intended[.]” Ex. 1008, ¶21; Ex. 2004, ¶114. This is a key benefit of *Kaplan* and “*contrasts sharply* with *conventional wireless networking system* setup procedures.” Ex. 1008, ¶21; Ex. 2004, ¶¶133-134.

In *Van de Laar* the dockees are able to connect to the WDH using Wi-Fi direct where the WDH is designed to be the Wi-Fi Direct Group Owner (GO). Ex. 1007, ¶111. Wi-Fi Direct, in contrast to *Kaplan*’s system, is a conventional wireless networking system with a setup procedure, the very type of system that *Kaplan* “*contrasts sharply*” with. Ex. 1008, ¶21; Ex. 2006, 41:2-5 (“I think it’s really, at

least in paragraph 6, just a reference to the Wi-Fi standard, and that includes the various ways in which device can be connected to each other.”). By providing separate groups, the primary dockee can use the WDH peripherals to give presentations to attendees and the secondary dockees can broadcast the presentation or the users can follow along on the WDH peripherals. Ex. 1007, ¶¶112-115. To establish this Wi-Fi Direct network, a user pairing step is needed for every new Wi-Fi Direct connection and such a pairing is performed in real time, rather than before shipment as is required by *Kaplan*. Ex. 1007, ¶116; Ex. 2004, ¶134; Ex. 2006, 41:2-5 (“I think it's really, at least in paragraph 6, just a reference to the Wi-Fi standard, and that includes the various ways in which device can be connected to each other.”).

A POSITA would not be motivated to reconcile *Kaplan's* and *Van de Laar's* transmission techniques. *Van de Laar* does not include a peripheral device that connects to a laptop or other user processing device to provide communications over the wireless communications network. Ex. 2004, ¶135. The dockee device (e.g., a laptop or comparable mobile device) communicates to its WDH via the integrated Wi-Fi or Bluetooth transceiver *of the dockee device*. Ex. 1007, ¶¶76, 111, Fig. 1 (showing the communications unit within the dockee). There is no intermediate peripheral device that provides the wireless connection like in *Kaplan*, and a POSITA would have no reason to implement the intermediate peripheral device to achieve the very functions already accomplished by *Van de Laar*. In fact, while the

Petition advocates modifying the receiver of *Kaplan* with *Van de Laar* to improve usability and allow for multiple functional devices in a unified communications call, these alleged improvements are already available without use of the intermediate peripheral device by using *Van de Laar's* system. Ex. 1007, Abstract; Ex. 2004, ¶135. A POSITA would not consider combining these two references without the benefit of hindsight.

Van de Laar's WDH provides connections to multiple dockee devices. Ex. 1007, Abstract, ¶¶1, 9 (“a system for wireless docking that enables multiple dockees to wirelessly dock to a host device”), 74; Ex. 2006, 43:5-11 (Dr. Almeroth indicating he did not consider *Van de Laar's* multiple dockee functionality in his combination). Multiple connections are enabled by communication networks, like Wi-Fi Direct, which require a user pairing for each new device. Ex. 1007, ¶116. *Kaplan's* receiver and transmitter do not connect to multiple devices wirelessly, but instead include a “walled garden” approach where a transmitter is pre-paired to a receiver and therefore only function in a 1-to-1 relationship. Ex. 1008, ¶¶18, 21; Ex. 2004, ¶136. There is no way to reconcile the pre-paired transmitter-receiver system of *Kaplan*, with the flexible and adaptable Wi-Fi Direct network of the WDH, and primary and secondary dockees. Ex. 2004, ¶136.

Further, *Kaplan* provides no discussion or teachings of using more than one transmitter. Ex. 2004, ¶136. There is no evidence that *Kaplan* could even manage

multiple transmitters given its requirement that the transmitter be pre-paired with the base before the package leaves the manufacturing facility, nor that it would be able to manage or organize separate classes of dockees (primary/secondary) or be able to adjust devices moving between these classes as described in *Van de Laar*. Ex. 2004, ¶136; *See* Ex. 1007, ¶121. Based on *Kaplan*'s teachings, utilizing more than one transmitter would require using more than one receiver (which would significantly impact usability). There would also need to be as many transmitters as users, which is impractical in the lecture/classroom context that *Van de Laar* is designed to operate in. *See*, Ex. 1007, ¶53; Ex. 2004, ¶136.

All of these alterations would abandon *Kaplan*'s "walled-garden" approach which was specifically designed to streamline and protect the user experience and would be a reason why a POSITA would *not* have been motivated to make any change to the transmission technique of *Kaplan* in view of *Van de Laar*. Ex. 1008, ¶21; Ex. 2004, ¶138. Thus, a POSITA would see no motivation and no reasonable expectation of improved usability to make such a substitution, let alone any change to *Kaplan* in view of *Van de Laar*.

2. The Petition's Arguments Fail to Identify Sufficient Motivation to Combine the Prior Art

The Petition also fails to provide a sufficient motivation to combine the references of Ground 2. Ex. 2004, ¶139. Instead, the Petition improperly relies substantially on disclosure of the '347 Patent itself, to arrive at the *Kaplan-Van de*

Laar-Christison combination.

The Petition concludes that, due to the existence of Skype noted in alleged AAPA, a combination of *Kaplan* and *Van de Laar* would result in using Skype, without explaining any reason why the two disparate systems would be used beyond alleged predictability. Petition, 43. The fact that the '347 Patent, and *Van de Laar* both acknowledge the existence of Skype hardly provides for a motivation to modify *Kaplan* and *Van de Laar*, especially for the reasons advocated *supra* Section V.G.1. *See Carnes*, IPR2019-00133 Paper 10 at 18. That Skype was purportedly “well-known” does not provide a motivation to combine *Kaplan* and *Van de Laar*. Ex. 2004, ¶140.

Further, the Petition argues that “*Kaplan*, *Van de Laar*, and *Christison* **could** have been combined by using *Christison*’s technique of presenting a remote device as native to **improve or suggest** one way for *Kaplan* to implement its disclosed functional devices.” Petition, 44. Such an argument is insufficient. *See Belden*, 805 F.3d at 1073. Yet again, merely alleging that content or elements were known independently is not sufficient to establish obviousness. *KSR v. Teleflex*, 550 U.S. 398, 418-19 (2007); Ex. 2004, ¶141. The Petition also fails to provide a coherent combination through its “optional” reliance on *Christison*. Ex. 2004, ¶143.

Rather than providing evidence of an actual motivation to combine, the Petition merely alleges that certain things were known and concludes they **could** be

predictably combined. These arguments amount to nothing more than allegations that the limitations of the '347 Patent were each known in isolation. As described in Ground 1 (*see supra* Section IV.F.3), such arguments are improper, and routinely rejected by the Federal Circuit. *Virtek*, 97 F.4th at 888.

VI. EVIDENCE ESTABLISHES NON-OBVIOUSNESS OF THE INVENTION

A determination of obviousness requires consideration of (1) the scope and content of the prior art; (2) the difference between the claims and the prior art; (3) the level of ordinary skill in the art; and (4) the presence of evidence of secondary considerations. *See Graham v. John Deere Co. of Kan. City*, 383 U.S. 1, 17-18 (1966). Secondary considerations include commercial success, industry praise, unexpected results, copying, industry skepticism, licensing, and long-felt but unsolved need. *Transocean Offshore Deepwater Drilling, Inc. v. Maersk Drilling USA, Inc.*, 699 F.3d 1340, 1349 (Fed. Cir. 2012). When evidence of secondary considerations is present, it must be considered by the Board. *Nike, Inc. v. Adidas AG*, 812 F.3d 1326, 1340 (Fed. Cir. 2016) (“We must therefore remand for the Board to examine Nike’s evidence and its impact, if any, on the Board’s analysis under the first three *Graham* factors.”). Patent Owners must show a sufficient nexus between the objective evidence and the claimed invention, but objective evidence “need only be reasonably commensurate with the scope of the claims[.]” *Rambus Inc. v. Rea*, 731 F.3d 1248, 1256, 1257 (Fed. Cir. 2013) (internal quotation marks and citation

omitted). A nexus is presumed when “the patentee shows that the asserted objective evidence is tied to a specific product and that product ‘embodies the complained features, and is coextensive with them.’” *Polaris Indus.*, 882 F.3d at 1072 (citing *Brown & Williamson Tobacco Corp. v. Philip Morris Inc.*, 229 F.3d 1120, 1130 (Fed. Cir. 2000)). Here, the proffered secondary considerations are based on both Barco’s patent practicing product and its competitors’ licensing activities.

“Licenses to the challenged patent then, unlike products or other forms of objective evidence of nonobviousness, do not require a nexus with respect to the specific claims at issue, nor does our nexus law require that a particular patent be the only patent being licensed or the sole motivation for entering into a license.” *Ancora Techs., Inc. v. Roku, Inc.*, 140 F.4th 1351, 1361 (Fed. Cir. 2025). Moreover, “the fact that a license concerns rights to more than one patent does not detract from the fact that each patent is a subject of the license.” *Id.* at 1363. Where “other patents may have also been part of the license [it] does not detract from the nexus inquiry. These licenses, taken by substantial parties paying substantial royalties to secure the right to practice the [challenged] patent, should have been given more, *if not controlling*, weight in the Board’s obviousness determination.” *Id.* at 1364. Here, the licensee is a sophisticated technology company in the videoconferencing space, confirming the technological value provided by the ’347 Patent.

A. Barco’s ClickShare System Embodies the Claimed Invention.

Patent Owner need not show “a perfect correspondence” between the claim invention and its own commercial product. *Fox Factory Inc., v. SRAM LLC*, 944 F.3d 1366, 1374 (Fed. Cir. 2019). Instead, the Patent Owner must show that the product is essentially the claimed invention. *Id.*, (citing *Demarco Corp., v. F. Von Langsdorff Licensing, Ltd.*, 851 F.2d 1387, 1392 (Fed. Cir. 1988)). Patent Owner provides a system for wireless presentation, which embodies claims of the ’347 Patent. Ex. 2013. Patent Owner identifies the ’347 Patent as practiced by a number of products in the ClickShare Conference line, including the CX-20, CX-30, CX-50 (Gen 1 and Gen 2), CB Core, and CB Pro as identified on its website.⁴ Ex. 2017, 9. The first of these ClickShare Conferencing products were added to the ClickShare line in 2020 and extended ClickShare’s “local sharing and collaboration capabilities with remote collaboration features by embracing traditional UC&C tools.” Ex. 2026;

⁴ The CX-20, CX-30, CX-50, CB Core, CB Pro, and the Button also practice other Patents owned by Patent Owner, six of which are subject to *inter partes* review. *See* IPR2024-01436; IPR2024-01437; IPR2024-01438; IPR2024-01439; IPR2025-00597; IPR2025-00598.

Ex. 2027; Ex. 2028; Ex. 2029; Ex. 2030.⁵ The features of the '347 Patent are evident with use of the 2020 generation of ClickShare Button (“ClickShare Button”) with one of the CX-20, CX-30, CX-50, CX-50 Gen2, CB Core, and CB Pro (“Barco Bases”). Together, ClickShare Button and a Barco Base form the Barco System.

The ClickShare marketing materials illustrate that the Barco System is essentially the claimed invention. *See generally* Ex. 2013; Ex. 2014. The features and benefits the '347 Patent's claims provide are evident in the Barco System. For example, “[r]unning high-quality meetings from your laptop is as simple as making a phone call. No hassle with control panels, passwords, or cables.” Ex. 2014, 4. Likewise, the ClickShare allows users to “use [] existing meeting room equipment or try [Barco's] all-in-one solutions, and connect with your laptop and trusted videoconferencing platform in any type of meeting room. And your guests can join

⁵This live-stream event from Gary Kayye includes evidence of the ClickShare Conference launch from third-party rAVE [PUBS], the entity and individual that also is the source of Exs. 2027 and 2028. At approximately 4:33-5:12 of the video Michael Vanderheeren explains the additional features available in ClickShare Conference (the product that embodies the claims of the '347 Patent) as compared to Barco's earlier ClickShare presentation products, including those identified in, for example, IPR2024-01436.

from any device” as noted in each independent claim of the ’347 Patent. Ex. 1001, Cl. 1, 12, 23, 27; Ex. 2013, 1. The relationship between the claims of the ’347 Patent and the Barco products are clear. *Demarco*, 851 F.2d at 1394 (“A requirement for proof of the negative of all imaginable contributing factors would be unfairly burdensome.”); *see* Ex. 2031, 199:23-200:11.

Since its introduction in 2020, the ClickShare Conference line of products has received praise by others with respect to the ’347 Patent claimed features which it embodies. For example, the “brand-new ClickShare Conferencing Button instantly makes meeting room USB-peripherals available to your laptop. Just plug in the Button and, straight away, you share all the video and audio streams with the meeting room peripherals.” Ex. 2027; Ex. 2028. Likewise, the “Clickshare Conference environment introduces a new king of Bring Your Own Meeting to reduce the excess pressure on IT departments to support different conferencing tools and person-centric experiences.... The solution combines cameras, soundbars, and other components in the room for a more immersive experience.” Ex. 2029. The excitement surrounding this launch is documented in, for example, the release live-stream event available at <https://www.youtube.com/live/SnOk-VjUJ0U>.

As is clear from the images of the products below, there is essentially no unclaimed feature in the accused products. The Barco System practices at least claims 1-18 of the ’347 Patent. Ex. 2004, ¶¶138-172.

1. Claim 1

- a. A method for connecting a processing device to a functional device, the functional device being connected to or in a base unit of a communications network, the processing device having a memory, a display and an operating system, wherein the processing device hosts a host application, further comprising:

The Barco System performs this limitation. Ex. 2004, ¶¶185-187. ClickShare Button connects the processing device to a base unit with functional devices connected to it:

What is ClickShare?

ClickShare is an [award-winning wireless meeting room system](#) for easy video conferencing, collaboration and presentation. It connects your laptop to the audio and video equipment of your conference room, so you can start your meeting in under 7 seconds with one click via the ClickShare Button or App.

Ex. 2013; Ex. 2004, ¶186.

A laptop is an example processing device having a memory, display, operating system, and compatible with host applications. Ex. 2004, ¶187. As shown below, the ClickShare Button is able to connect to a functional device (e.g., webcam) connected to the Barco Base by using the Barco System. The processing device obtains image data from the soda can clearly in view of the camera connected to the Barco Base:

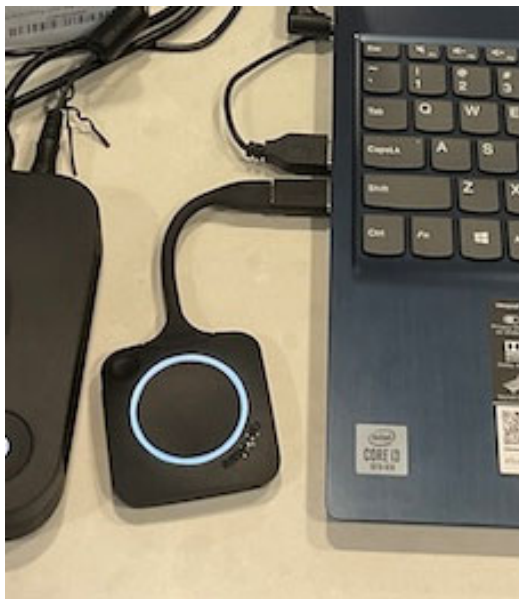


Ex. 2004, ¶187.

- b. a first peripheral device being configured to be coupled to the processing device via a generic communications protocol, the base unit having a transmitter and the first peripheral device having a receiver and at least one fixed or configurable endpoint of the functional device is exposed on the first peripheral device, the method further comprising:

The Barco System performs this limitation. Ex. 2004, ¶¶188-193. The base unit includes a transceiver capable of IEEE 802.11 a/g/n/ac and IEEE 802.15.1 transmission. Ex. 2025, 2; Ex. 2004, ¶193. Further, as depicted below, the

ClickShare Button is adapted couple to a processing device:



Ex. 2004, ¶189.

Clickshare Button's connector connects to a processing device via a generic communications protocol such as USB-C type connection and includes a transceiver capable of IEEE 802.11 a/b/g/n/ac:

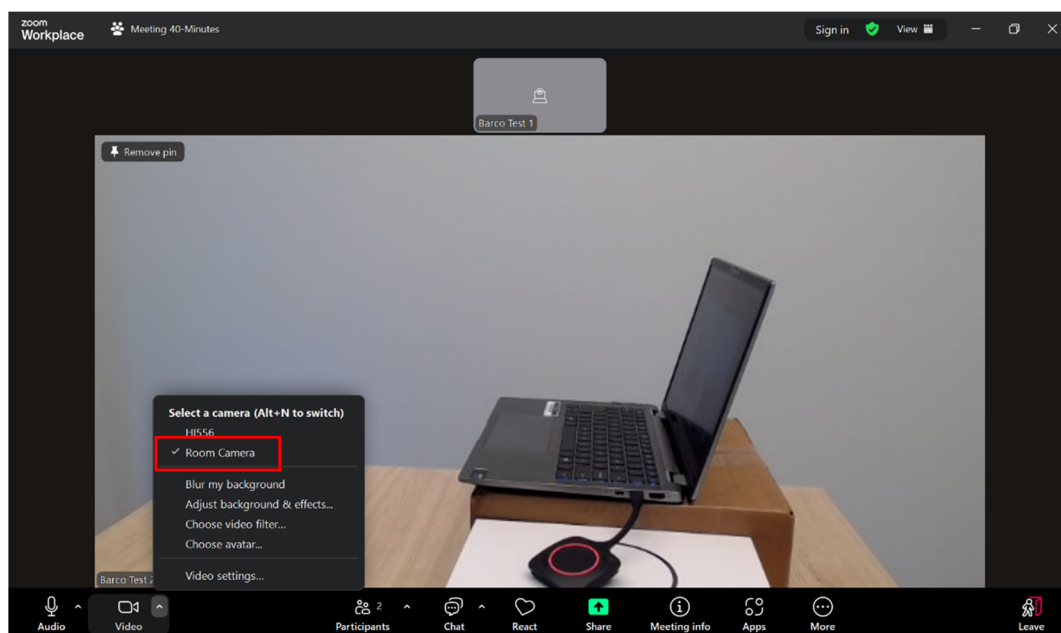
General specifications

Connectors	USB-C type
Authentication protocol	WPA2-PSK in stand alone mode WPA2-PSK or IEEE 802.1X in network integration mode
Wireless transmission protocol	IEEE 802.11 a/b/g/n/ac
Frequency band	2.4 GHZ and 5 GHZ

Ex. 2014; Ex. 2004, ¶190.

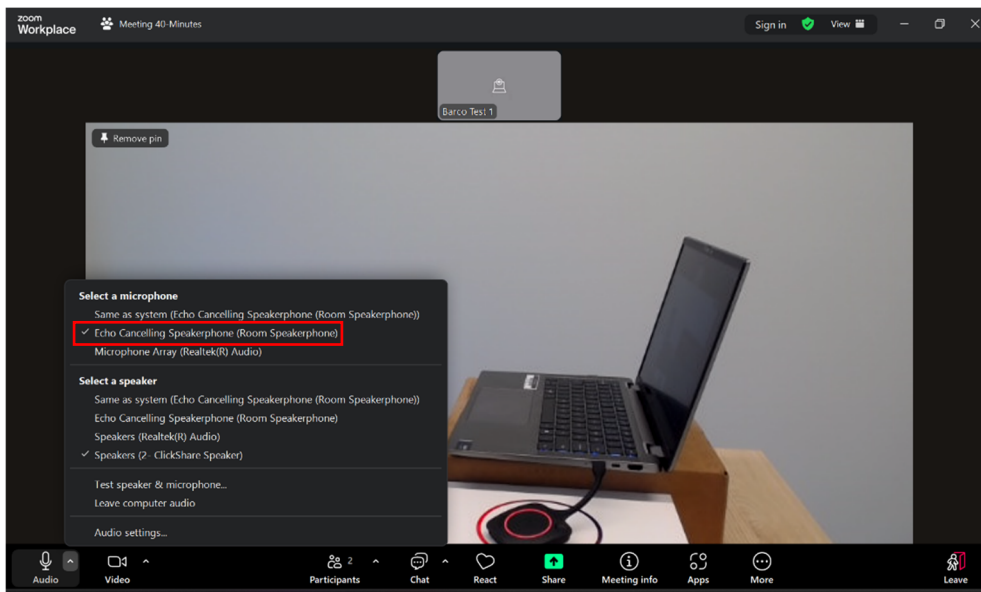
The ClickShare Button also includes at least one fixed or configurable endpoint of the functional device which is exposed on the peripheral device. For example, the ClickShare button provides a configurable endpoint of a data source

which emits data of a functional device, like a webcam, or microphone which is available on the processing device. In the example below, the RoomCamera (annotated in red) shares video content of the processing device itself, taken from the webcam connected to the Barco Base to the processing device connected to the ClickShare Button in the image below:



Ex. 2030, ¶190.

The Room Speakerphone (annotated in red) is also available as shown in the image below:



Ex. 2004, ¶190.

As shown in the image below, the Room Camera and Room Speakerphone are exposed over the USB connection of the ClickShare Button:

Device Name	Description	Friendly Name	Driver Filename	Driver Description	Con...
Room Camera	USB Composite Device		usbccgp.sys	USB Composite Device	Yes
Port_#0010.Hub_#0001	Intel(R) Wireless Bluetooth(R)		BTHUSB.sys	Intel(R) Wireless Bluetooth...	Yes
Port_#0009.Hub_#0001	Synaptics UWP WBDI		WUDFRd.sys	Synaptics UWP WBDI	Yes
Port_#0008.Hub_#0001	USB Composite Device		usbccgp.sys	USB Composite Device	Yes
Port_#0005.Hub_#0001	Generic USB Hub		UsbHub3.sys	Generic USB Hub	Yes
ClickShare	USB Composite Device		usbccgp.sys	USB Composite Device	Yes
0000.0014.0000.008.000.000.000...	Integrated Camera	@oem123.inf %DeviceDesc: R...	usbvideo.sys	Integrated Camera	Yes
0000.0014.0000.005.002.000.000...	USB Video Device	Room Camera	usbvideo.sys	USB Video Device	Yes
0000.0014.0000.005.002.000.000...	USB Audio Device	Room Speakerphone	usbaudio.sys	USB Audio Device	Yes
0000.0014.0000.005.002.000.000...	USB Input Device		hidusb.sys	USB Input Device	Yes
0000.0014.0000.005.001.000.000...	USB Audio Device	ClickShare Speaker	usbaudio.sys	USB Audio Device	Yes
0000.0014.0000.005.001.000.000...	USB Mass Storage Device		USBSTOR.SYS	USB Mass Storage Device	Yes
0000.0014.0000.005.001.000.000...	Barco ClickShare Button	Barco ClickShare Button	BarcoClickShareDr...	Barco ClickShare Button	Yes
0000.0014.0000.005.001.000.000...	USB Input Device		hidusb.sys	USB Input Device	Yes
0000.0014.0000.005.001.000.000...	USB Input Device		hidusb.sys	USB Input Device	Yes
0000.0014.0000.005.001.000.000...	USB Input Device		hidusb.sys	USB Input Device	Yes

Ex. 2004, ¶¶191-192.

- c. the base unit being configured to transmit and the first peripheral device being configured to receive first processed video data over the communications network,

The Barco System performs this limitation. As described in Section VI.A.1.b,

the Barco Base and the ClickShare Button include transceivers for communicating data (such as video data) over a communications network. Ex. 2004, ¶194.

- d. the functional device being configured for first video data to flow into the base unit or first video data is captured in the base unit, the first video data being processed in the base unit to generate the first processed video data, wherein the first processed video data is sent to the first peripheral device,

The Barco System performs this limitation. As shown *supra* Section VI.A.1.a, a webcam connected to the Barco Base allows for data to be captured in the base unit and communicated to the first peripheral device. Ex. 2004, ¶195. The Barco Base also processes the data at least by an authenticated encryption scheme. Ex. 2026, 10, 14 (“The conference peripherals that are sent from the Base Unit to the user via the Button are also secured with the same mechanisms”); Ex. 2004, ¶195.

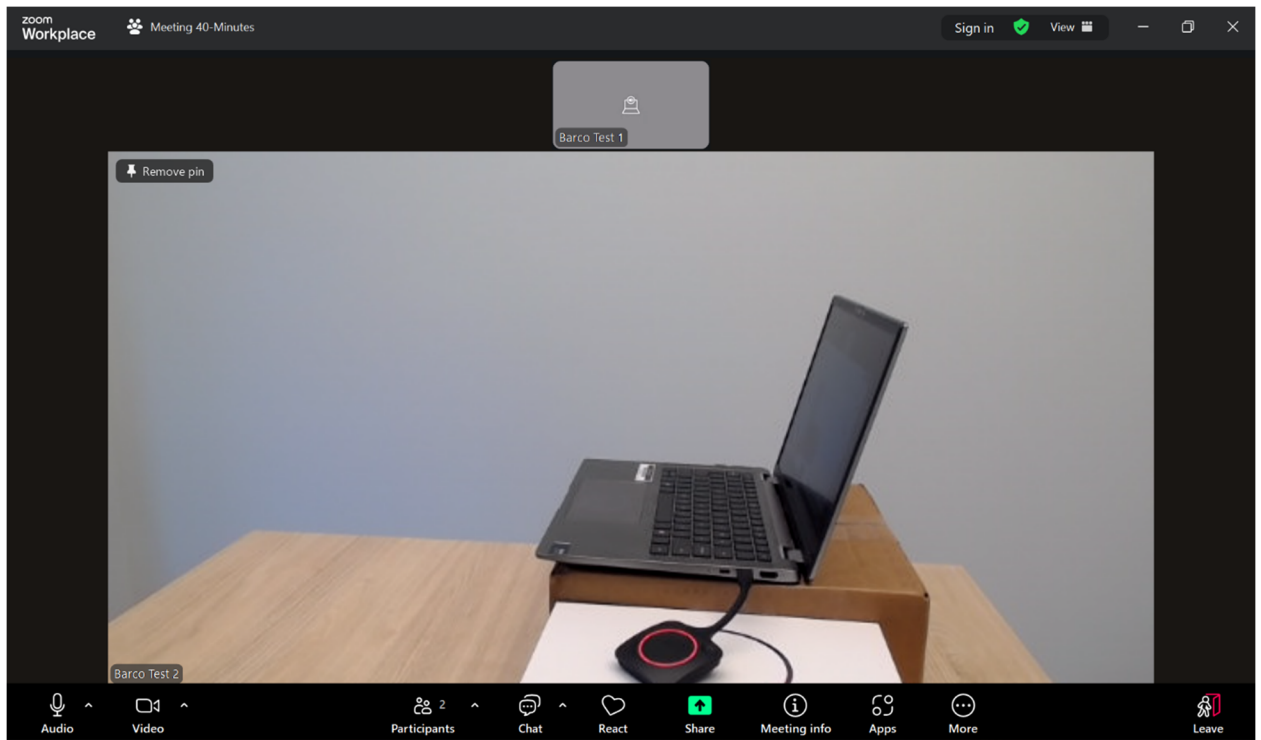
- e. the first peripheral device being configured to process the first processed video data received by the first peripheral device to generate second video data, the first peripheral device being configured to make the second video data available through the at least one fixed or configurable endpoint of the first peripheral device,

The Barco System performs this limitation. Ex. 2004, ¶196. The data sent from the Barco Base is encrypted, and decrypted at the peripheral device. Ex. 2026, 10, 14 (“The conference peripherals that are sent from the Base Unit to the user via

the Button are also secured with the same mechanisms”); Ex. 2004, ¶196. This data is available on at least one fixed or configurable endpoint of the first peripheral device. *Supra* Section VI.A.1.b. Ex. 2004, ¶196.

- f. the operating system of the processing device being configured to capture the second video data and to make it available through a custom or standard driver to either the host application or a 3rd party application running on the processing device or to other processing devices,

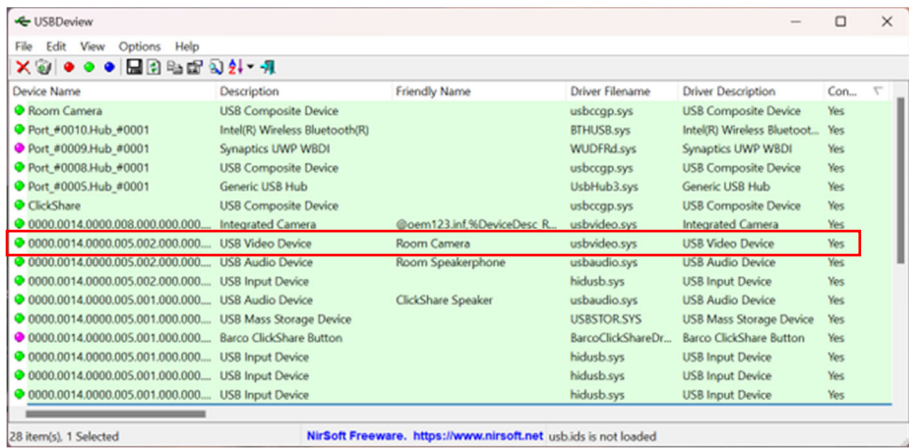
The Barco System performs this limitation. Ex. 2004, ¶197. As shown in the image below, the processing device is capable of hosting a Zoom call using the video data that shares video data from the webcam connected to the Barco Base:



Ex. 2004, ¶197.

The video data is made available through a USB Video device driver,

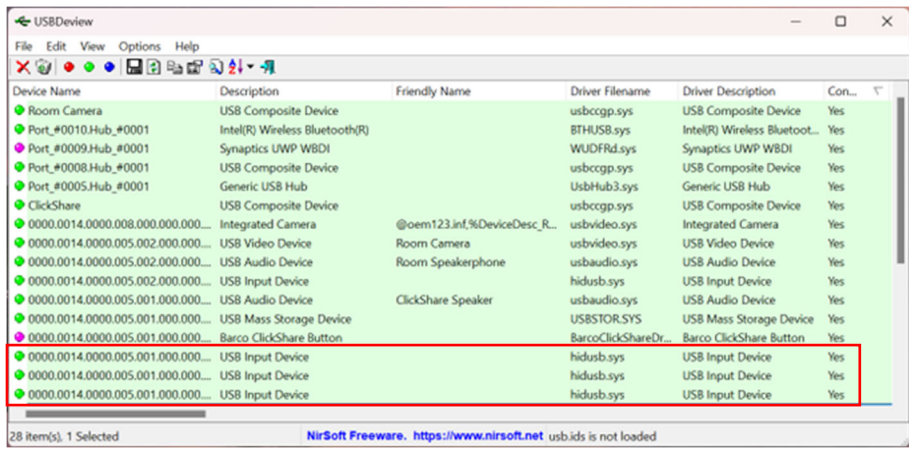
usbvideo.sys:



Ex. 2004, ¶198.

- g. wherein third video data, received from the host application and/or from the 3rd party application running on the processing device, is sent to an endpoint of the first peripheral device via a standard generic driver, the first peripheral device receiving the third video data and processing the third video data to form second processed video data, and

The Barco System performs this limitation. Ex. 2004, ¶199. The ClickShare Button presents multiple human interface devices that use hidusb.sys drivers, which can be used to communicate video data to the endpoint of the ClickShare Button:



Ex. 2004, ¶199.

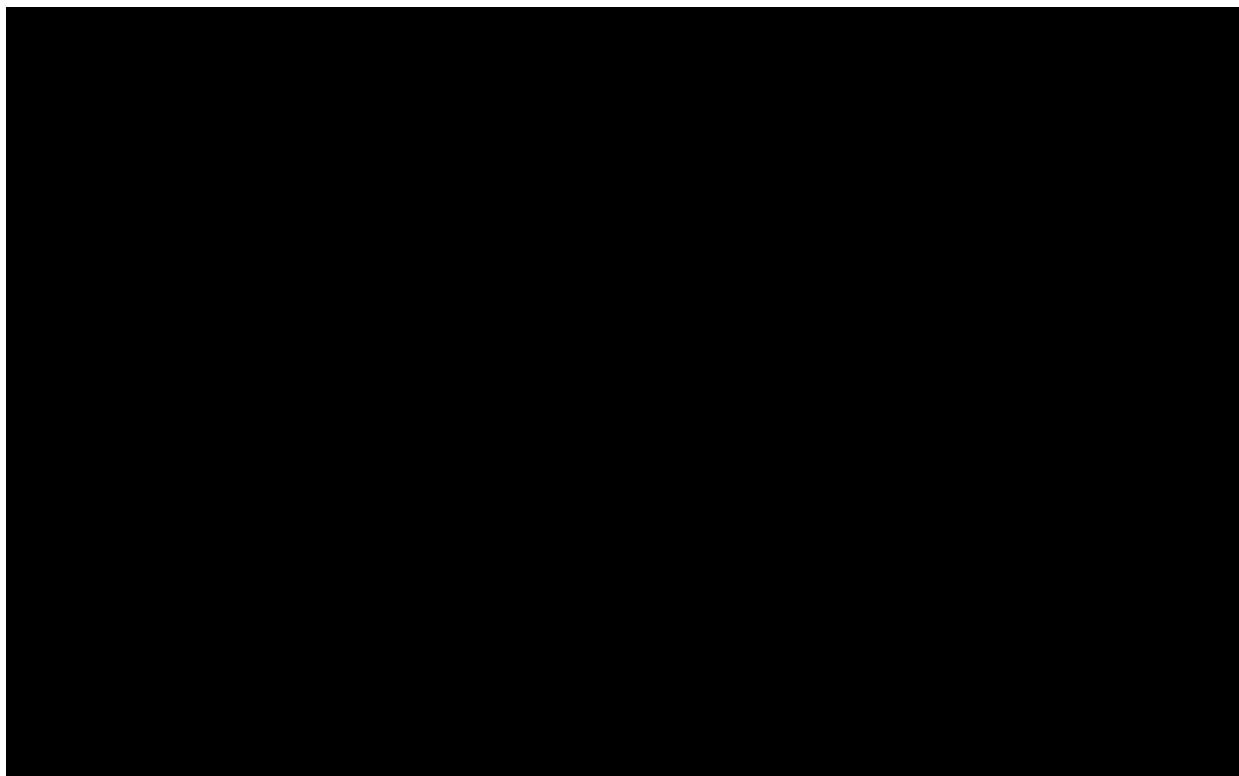
The ClickShare Button also processes the third video data to form the second processed data. Ex. 2004, ¶200. The ClickShare button performs encryption. Ex. 2026, 10 (“WPA2-PSK encryption ensures the confidentiality and integrity of all data passing through the wireless channel.”).

- h. wherein the base unit receives the second processed data, and decodes and/or enhances the second processed data and forwards it to a functional device which is connected or attached to the base unit through a serial connection.

The Barco System performs this limitation. Ex. 2004, ¶201. The Barco Base is capable of connecting to a display through a serial connection and shows the shared content from a laptop connected to the ClickShare Button. Ex. 2004, ¶201. This would involve the Barco Base decrypting the data. Ex. 2026, 10 (“WPA2-PSK encryption ensures the confidentiality and integrity of all data passing through the wireless channel.”).

B. The Barco System Has Achieved Significant Commercial Success

The commercial success of the Barco Practicing System is demonstrated by the United States Net Sales Annual Totals for the ClickShare Conference product line (the CX-20, CX-30, CX-50 (Gen 1 and Gen 2), CB Core, CB Pro, and the Button):



6 [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

Over this period, Patent Owner has [REDACTED] in revenue and [REDACTED] in estimated gross profit in the United States from its commercialization of the invention claimed in the '347 Patent. Ex. 2010. Patent Owner's commercial success using its patented invention is strong evidence that the claims of the '347 Patent are non-obvious.

C. Acquiescence of Market Competitors

Crestron, a sophisticated engineering company, is a licensee of the '347 Patent. Ex. 2011, 15. Crestron is, and has been, a leading innovator in the commercial and residential control and automation solutions for over 40 years. Ex. 2019. Crestron's sophistication relating to intellectual property is evidenced by their ownership of 460 separate patents in numerous fields including the following CPC codes: electric digital data processing, fixed or movable closures for openings in buildings, vehicles, fences or like enclosures in general, loudspeakers, microphones, gramophone pick-ups or like acoustic, electromechanical transducers, printed circuits, and transmission of digital information. Ex. 2019. Crestron is a competitor of Patent Owner. Ex. 2023, 28:22-29:16.

[REDACTED]

[REDACTED]

[REDACTED]

“Licenses to the challenged patent then, unlike products or other forms of objective evidence of nonobviousness, do not require a nexus with respect to the specific claims at issue, nor does our nexus law require that a particular patent be the only patent being licensed or the sole motivation for entering into a license.” *Ancora Techs.* 140 F.4th at 1361. The fact that Crestron is an industry leader in the videoconference space, further strengthens the evidentiary value of the Crestron license for the purpose of proving nonobviousness. *RCA Corp. v. Data General Corp.*, 701 F. Supp 456, 471 (D. Del. 1988), *aff’d*, 887 F.2d 1056 (Fed. Cir. 1989); *B&H Manufacturing Inc. v. Foster-Forbes Glass Co.*, 26 USPQ2d 1066, 1070 (N.D. Ind. 1993) (the Licensees represented major industry players, which was found to be evidence that “they would not have bowed to pressure to take a license without first reaching the conclusion that ultimately litigation would prove futile.”); *see also Columbia Broadcasting Sys. v. Sylvania Elec. Prods., Inc.*, 415 F.2d 719, 728 (1st Cir. 1969), cert denied, 396 U.S. 1061 (1970).

Crestron also prominently identifies the Barco licensed patents on its website and praises Barco for its innovation. Ex. 2018; Ex. 2012.

Upon agreeing to the license, Andrew Ludke, the Senior Director of Project Management at Crestron, praised Barco’s patented inventions stating that “Our customers expect fully integrated solutions that make workplace collaboration

simple. With this agreement we will bring robust wireless conferencing ***based on Barco's ClickShare intellectual property*** to our popular digital workplace technologies to meet the growing demand for BYOM solutions[.]” Ex. 2012. The license agreement, by Mr. Ludke’s own admission, has been “mutually beneficial[.]” Ex. 2023, 76:12-18. Given that Crestron has already paid more than the cost of litigation in licensing, its public praise and acquiescence to the validity of Barco’s patent portfolio, including the ’347 Patent, is strong, indisputable evidence of the non-obviousness of the ’347 Patent claims.

VII. CONCLUSION

For the reasons set forth above, the patentability of all claims of the ’347 Patent should be upheld.

Dated: January 15, 2026

Respectfully submitted,

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Certification of Word Count Under 37 C.F.R. § 42.24(d)

The undersigned hereby certifies that the foregoing contains 13,937 words according to the word count of the word-processing software used to prepare the foregoing.

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CERTIFICATE OF SERVICE

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

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