

UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CENTRALSQUARE TECHNOLOGIES, LLC,  
Petitioner,  
v.  
CARBYNE, LTD.,  
Patent Owner.

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Case No. IPR2025-01179

U.S. Patent No. 11,689,383

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**PATENT OWNER'S PRELIMINARY RESPONSE**

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## I. INTRODUCTION

Patent Owner Carbyne, Inc. respectfully submits this Preliminary Response to the Petitioner CentralSquare Technologies, LLC's Petition for *Inter Partes* Review (Paper 1, "Petition") of U.S. Patent No. 11,689,383 ("the '383 patent).

The '383 patent relates to a system and method that allows an emergency caller and dispatcher to engage in simultaneous audio and WebRTC real-time video communication. As explained below, this is a fundamental feature of the '383 patent's claimed invention, and is described in detail in the '383 patent's specification. According to the patent, the receipt of both audio and real-time video allows the dispatcher to better assess and respond to an emergency.

The Petition here includes two grounds: ***Ground 1*** argues that certain claims are either anticipated or rendered obvious by Ramanujaiaha (Ex. 1005). ***Ground 2*** argues that the claims are obvious over the combination of Ramanujaiaha and Krishnan (Ex. 1006). Neither ground has merit. Neither reference teaches or renders obvious (either alone or in combination) a system and method where an emergency caller and dispatcher *simultaneously* engage in audio and WebRTC real-time video communication.

Ramanujaiaha—the only reference at issue in ***Ground 1***—is not anticipatory. It also does not render the claimed subject matter obvious. Again, all of the claims require simultaneous audio and real-time video communication: a "recipient" must

receive a “real-time video stream ... through the WebRTC session while audio content of the emergency call is received.” Ramanujaiaha references audio calls. It separately identifies WebRTC as possible method of communication between a customer and a call center. And it notes that a call center can send a calling customer “visual” information (like a web page, interactive form, or interactive menu) while a call is ongoing. But it includes no disclosure of the simultaneous conduct of audio and WebRTC real-time video communication between a caller and recipient as claimed. Thus, there is no anticipation. Moreover, the Petition fails to explain why a POSITA would have been motivated to combine Ramanujaiaha’s separate teachings to arrive at the claimed subject matter. This is required to show obviousness; pointing to separate prior art teachings is not enough.

**Ground 2** is no better. Once again, the Petition points to separate, distinct teachings in the prior art without providing any explanation regarding how (or why) those teachings would be combined to arrive at the claims. Like Ramanujaiaha, Krishnan separately discusses voice calls and other forms of communication (such as pictures, videos or text sent via WebRTC). It also notes that data can be communicated to an emergency dispatcher before connecting (and for purposes of prioritizing) incoming emergency calls. But the Petition never explains how this staged, ordered prioritization process would have led a POSITA to the claimed simultaneous audio and WebRTC real-time video communications.

In sum, there has been a complete failure of proof. The Petition does nothing more than point to separate, distinct prior art disclosures. It makes no effort to explain (let alone present evidence showing) why the prior art would be combined in the way the claims here all require.

## **II. ARGUMENT**

### **A. Overview of the '383 Patent**

The '383 patent (Ex. 1001) explains that it “relates generally to streaming of data ... from a user device without the need to download and install a specialized application.” '383 patent, 1:25-28. The patent explains that “[m]any mobile devices on the market today ... come equipped with built-in media capturing components” like “still cameras, video cameras, microphones, global positioning receivers, and the like.” *Id.*, 1:29-32. The patent goes on to note that the information collected by these components may be extremely useful when the mobile device user calls “an emergency or municipal dispatch unit” seeking assistance. *Id.*, 1:37-39, 45-50. “[E]very additional detail that can be retrieved from the call may help the dispatch operator better understand the situation in the field, and explain to the dispatched forces the situation before they arrive on-scene so they can be better prepared.” *Id.* The patent also explains that existing systems for collecting additional information during emergency calls require users to “download and install specialized applications, which may take time, losing precious moments of data.” *Id.*, 1:58-60.

To achieve enhanced emergency call data collection—while avoiding the problems of the prior art—the '383 patent goes on to disclose a “method for streaming real-time data from a user device to a dispatch unit terminal.” *Id.*, 2:21-25. Rather than requiring special software on the user device, the '383 patent's method transmits “a link” to that device that “includes instructions to initiate streaming of real-time data” in a way that “match[es]” that data to an existing “connection” between the user device and the “dispatch terminal.” *Id.*, 2:23-31. The link can be in the form of a “URL” sent to the device in a text message. *Id.*, 2:57-3:2. The texted URL “allows the user to click on the URL to access a web browser” (rather than special purpose software) “to establish a WebRTC (Web Real-Time Communication) session to transmit a real-time video stream” from the device to the dispatcher. *Id.*, 3:1-12.

Figure 2 provides an example of this method. As shown, “a call is” first “initiated from a user device 130, e.g., a user dials 9-1-1 to report a robbery....” *Id.*, 7:37-40. The call is “connected to a call center 135” and then “forwarded to an appropriate DUT” (or dispatch unit terminal) “140.” *Id.*, 7:40-42. “When the call is answered,” a “server 120 identifies the UD 130 and sends a link over a second connection, such as an SMS, to the UD 130.” *Id.*, 7:42-45. Upon receipt of the SMS, “the user engages the link” and the user device's “web browser is launched....”

*Id.*, 7:45-46. This in turn allows for “streaming of real-time data, such as video, audio, location data, and the like from the UD 130” to the “DUT 140.” *Id.*, 7:45-49.

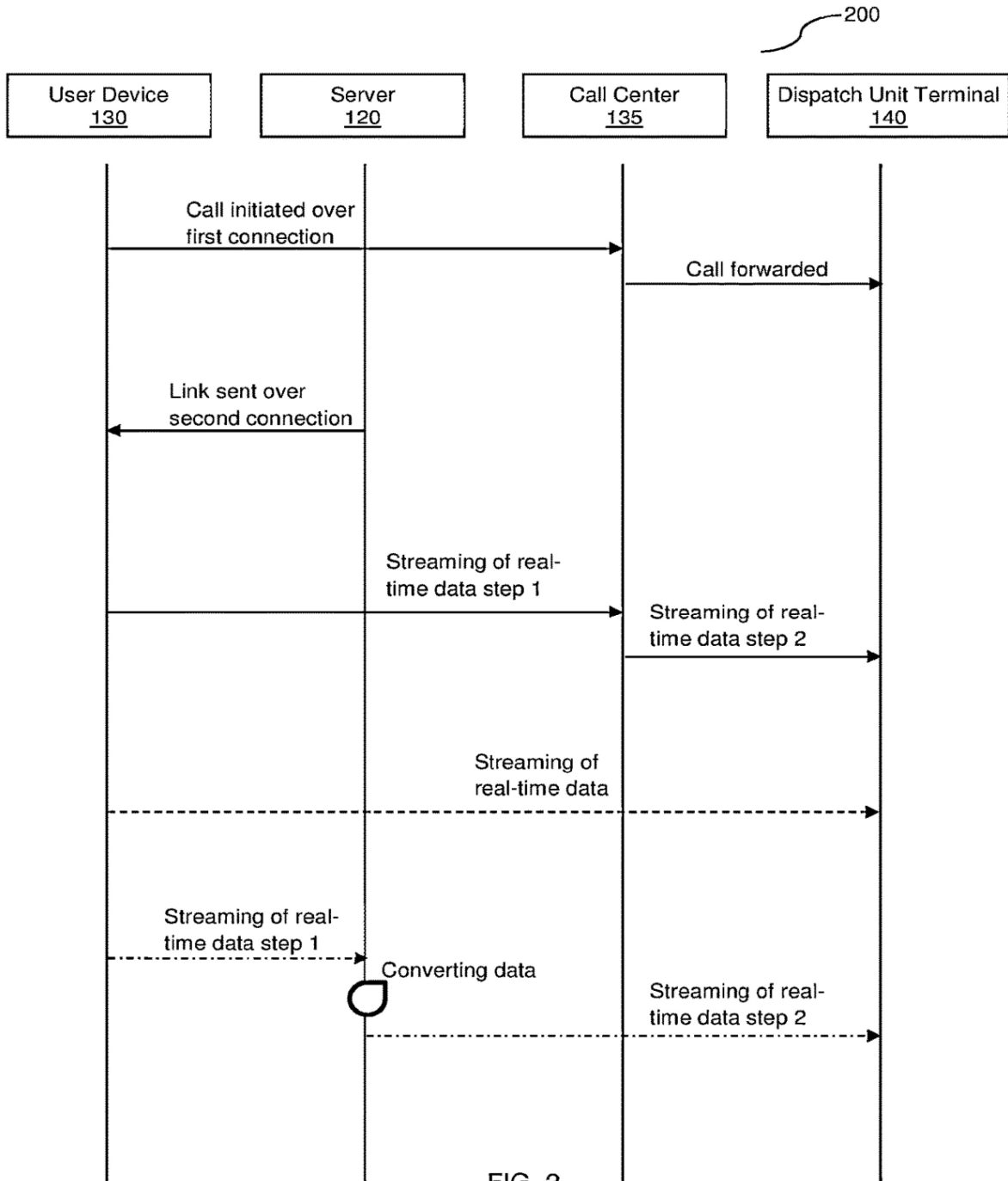


FIG. 2

*Id.*, Fig. 2. Thus, the dispatch unit terminal receives additional real-time data from the user device after an emergency call has been made and answered. *See id.* According to the '383 patent, this “may enable a dispatch operator operating the DUT 140 to have a better perspective of the circumstances where the UD 130 is located.” *Id.*, 7:60-65.

**B. Asserted Prior Art**

The Petition in this proceeding focuses on two references: Ramanujaiaha (Ex. 1005) and Krishnan (Ex. 1006).

Ramanujaiaha relates to a system for “enhanc[ing] ... the customer relationship or the buying/servicing experience overall” when a customer calls into a customer service line. Ramanujaiaha, 1:26-35. “Enhancing or optimizing such interactions may result in greater CX and positive outcome for the business.” *Id.*, 1:33-35. To achieve this goal, Ramanujaiaha’s system allows customers to engage in a “multi-channel communication concurrently through multiple mediums in order to, for example, fill a form visually, while being provided voice instructions through an interactive voice response (IVR) system or through a live agent.” *Id.*, 5:29-34. Alternatively, the customer may be provided with the ability to “switch” communication methods. *Id.*, 5:33-35. For instance, “a customer desiring to speak with a live agent over a voice medium may decide to switch the interaction modality

to chat, for example, when the wait time for engaging in a chat session is shorter than a voice session.” *Id.*, 5:35-42.

Krishnan relates to the “management of callers reporting an emergent event.” Krishnan, 1:7-8. Krishnan explains that “[u]tilization of audio information alone can make call prioritization” (or “triage”) “very difficult” during an emergency. *Id.*, 1:28-32. Thus, Krishnan proposes routing emergency callers to a “trusted data channel (e.g., a WebRTC call) with a PSAP system” that allows the caller to “provide their perspective about the event via the data channel.” *Id.*, 1:41-44. This collected data allows the PSAP to “determine information about the event (e.g., to build a picture of the scenario) as well as determine which caller gets through to the PSAP agent first and which callers wait.” *Id.*, 1:44-49.

### **C. Petitioner Fails to Show Unpatentability**

The Petition does not show unpatentability. Neither Ramanujaiaha nor the combination of Ramanujaiaha and Krishnan teach or render obvious a method and system that provides for the simultaneous conduct of audio communication and real-time video streaming during an emergency call.

#### **1. Ground 1**

Ground 1 in the Petition argues that Ramanujaiaha either anticipates or renders obvious claims 1-6, 8-13, and 15-19 of the ’383 patent. *See* Petition at 1.

The Petition is wrong on both counts. Ramanujaiaha does not anticipate. It also does not render the claims obvious.

The method of independent claim 1 of the '383 patent requires two forms of communication: (1) “an emergency call” between a mobile device and recipient “conducted ... through a first connection[,]” and (2) “a WebRTC ... session to transmit a real-time stream from the mobile device” to the recipient. The claim also requires that “the real-time video stream” be “sen[t] ... to the recipient for display,” such that the “real-time video stream is received through the WebRTC session while audio content of the emergency call is received through the first connection.” In other words, an audio call and real-time video communication via WebRTC with the recipient must occur simultaneously. See '383 patent, claim 1. The patent’s two other independent claims—8 and 15—include an analogous requirement. See *id.*, claims 8, 15.

Like the claims, the '383 patent specification emphasizes the importance of simultaneous audio and video communication between a mobile device and a recipient (like an emergency dispatcher) during an emergency. According to the patent, “every additional detail that can be retrieved” during an emergency call “may help the dispatch operator better understand the situation in the field....” *Id.*, 1:45-48; see also *id.*, 7:60-65 (noting that receipt of real-time data allows a dispatcher “to have a better perspective of the circumstances where” a user device “is located”).

But while “mobile devices ... come equipped with built-in media capturing components[,]” these are “rarely used” “when a person calls an emergency or municipal dispatch unit.” *Id.*, 1:29-31, 37-40. To address this problem, and improve emergency communications, the ’383 patent’s system and method allows for “streaming real-time data from a user device to a dispatch unit terminal” while an audio call is still ongoing. *Id.*, 2:21-31; *see also id.*, 2:67-3:12 (discussing transmission of a “real-time video stream from the mobile device” through a “WebRTC session”). This feature also served to distinguish the ’383 patent from the prior art, leading to claim allowance during prosecution. *See Ex. 1002*, pp. 18-19 (noting that the prior art fails to teach a system and method “wherein the real-time video stream is received through the WebRTC session while audio content of the emergency call is received through the first connection”).

There is no disclosure of *simultaneous* audio and real-time video communications during an emergency call in Ramanujaiaha. Indeed, the Petition fails to present any cogent explanation of or evidence showing why the prior art teaches this fundamental claim requirement.

According to the Petition, Ramanujaiaha “discloses or renders obvious” the claimed receipt of a real-time video stream while an audio emergency call is ongoing because it references a system that employs “two modalities, a voice media channel that uses the media connection device 215, and a visual medial channel that uses the

... mobile web 220.” Petition at 35. The Petition then goes on to explain that Ramanujaiaha teaches “concurrently invoc[ing]” both a “voice channel and a visual channel ... during an interaction.” *Id.* at 35-36. From this, Petition appears to conclude—with no explanation or evidence—that the referenced “visual channel” in Ramanujaiaha must for some reason be a “video stream using WebRTC.” *Id.*

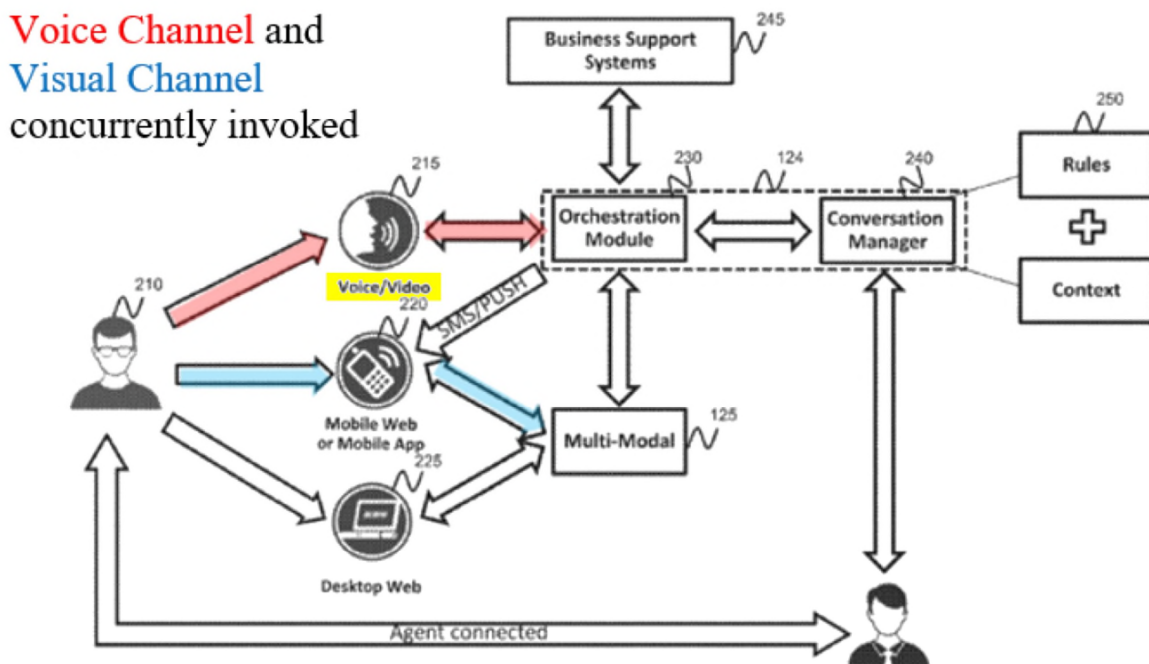
This is wrong. To begin, there is no teaching anywhere in Ramanujaiaha that the “visual channel” that is “concurrently invoked” along with an a “voice channel” is WebRTC real-time video as all the ’383 patent’s claims require. Instead, Ramanujaiaha explains that this “visual channel” is “visual content” that is “render[ed]” by either a “web browser or mobile application” running on the user’s device. Ramanujaiaha, 10:39-45; *see also id.*, 5:35-36 (identifying a “web site or email” as examples of “visual” content); 11:5-11 (explaining that “visual content” can be “generate[d] ... for presenting ... on the interface of” a user device); 13:48-49 (referencing a “visual page” provided for display by a user “web browser”). This allows, for instance, the user to “fill a form visually, while being provided voice instructions through an interactive voice response (IVR) system or through a live agent.” *Id.*, 5:33-36. Alternatively, “visual content” such as “visual user interfaces (e.g., IVR menu, video, etc.)” can be provided to the “user device.” *Id.*, 11:5-12; *see also id.*, 12:30-37 (repeatedly referring to a “visual media channel” that is used to provide a user device with a “visual IVR” or interactive menu). So, while

Ramanujaiaha does identify rendered web pages, fillable forms, and visual user interfaces as “visual” content that can be transmitted to a user during a “voice” call, it *never says* that WebRTC real-time video is an alternative example of “visual” content that can accompany “voice” communication.

The Petition does cite passages in Ramanujaiaha that reference “WebRTC.” See Petition at 35-36 (citing Ramanujaiaha, 9:46-52, 10:34-42). But these passages merely refer to *generic methods for communication* that may be available to a user. For example, Ramanujaiaha explains that a “contact center system” may have a “web page” that “provides a mechanism for contacting the contact center, via, for example, web chat, voice call, email web real time communication (WebRTC), or the like.” Ramanujaiaha, 8:14-27. So, WebRTC is simply one method that may be used by a user to reach a contact center in the first place. Ramanujaiaha also lists “WebRTC” among a collection of other “media connection[s]” or “communication channel[s]” available to a “user 210” for purposes of “communicating with the contact center.” *Id.*, 9:46-52, 10:34-42. But again, WebRTC is simply one of many means of communication that may be present on and employed by a user device. *None* of these passages state that a user device engages in simultaneous audio and real-time video communication with a contact center. Instead, as noted above, the only types of “multi-modal” communication discussed in Ramanujaiaha is the

provision of “visual” content—like a web page, fillable form, or interactive menu—to the user device while another form of communication is ongoing.

This is reinforced by Figure 2 of Ramanujaiaha, which the Petition cites repeatedly. As shown below, Ramanujaiaha identifies “video” as transmitted over the “voice channel” (annotated red by Petitioner), not the “visual channel” (annotated blue by Petitioner):



Petition at 36 (reproducing Ramanujaiaha, Fig. 2 in annotated form with further yellow annotation added by Patent Owner). In other words, in Ramanujaiaha, “video” is identified as an alternative to communication via audio. It is just another way to initially communicate with the contact center. These two forms of

communication are not meant to occur—and are never identified as occurring—at the same time as all the '383 patent's claims require.

It follows that Ramanujaiaha is not anticipatory. To anticipate, a single prior art reference must by itself disclose every required claim element. *Eli Lilly & Co. v. Zenith Goldline Pharms., Inc.*, 471 F.3d 1369, 1375 (Fed. Cir. 2006). Moreover, it is not enough to simply point to claim elements separately present in the prior art. For there to be anticipation, the required elements must also be “arranged or combined in the same way as in the claim.” *Net Money-IN, Inc. v. VeriSign, Inc.*, 545 F.3d 1359, 1370 (Fed. Cir. 2008).

There is nothing of the sort in Ramanujaiaha. Ramanujaiaha does reference “concurrent[]” invocation of a “voice” and “visual” “channel” using a “multimodal server.” *E.g.*, Ramanujaiaha, 10:55-59. But it never says that the “visual” channel is real-time video. The only examples it provides of “visual” communications are web sites, fillable forms, and interactive menus. Ramanujaiaha includes no disclosure of audio and real-time video communications that are to occur simultaneously. Next, Ramanujaiaha does reference WebRTC. *See, e.g., id.*, 9:46-52, 9:32-38. But again, it never discloses that WebRTC real-time video is transmitted from the user device to the contact center at the same time an audio call is occurring. That, however, is what the '383 patent's claims require.

The Petition also failed to show that Ramanujaiaha renders the claims obvious. “[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.” *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 418 (2007). There must also be “a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does.” *Id.* The Petition does not make this type of showing.

Here, the Petition cites to Ramanujaiaha’s identification of WebRTC real-time video as a possible form of communication. *See* Petition at 25-27. The Petition also cites Ramanujaiaha separate discussion of concurrent provision of “voice” and “visual” content (like a web page, form, or interactive menu) to a mobile device. *See id.* at 35-37. But the Petition includes *no explanation whatsoever* regarding why a POSITA would have been motivated to combine these different teachings together. The section of the Petition discussing the claim requirement that “real-time video stream [be] received through the WebRTC session while audio content of the emergency call is received” does not even mention motivation to combine. *See id.* Petitioner’s expert likewise completely ignores this fundamental requirement for showing obviousness. *See* Ex. 1003, ¶¶ 113-115. Instead, both Petitioner and its expert appear to simply assume that the “visual content” or “visual channel” in Ramanujaiaha is necessarily real-time video. It is not. Again, the only examples of

this type of communication Ramanujaiaha provides are (1) “visual content” that is “render[ed]” by a “web browser” (like a web page or interactive form) or (2) a “visual user interface.” Ramanujaiaha, 10:39-45; 11:5-12. And voice and video communications with the call center are expressly disclosed as alternative means of communication over a single channel. See, e.g., *id.*, Fig. 2. The Petition is completely devoid of any explanation of why a POSITA would have configured Ramanujaiaha any differently. There is no explanation anywhere in the Petition of why a POSITA would have employed audio and real-time video communication at the same time, what benefit this would have provided, or how it would have been accomplished.

The Petition does include a brief section entitled “motivation to combine” when discussing why—in its view—Ramanujaiaha teaches “establish[ment of] a WebRTC (Web Real-Time Communication) session to transmit a real-time video stream from the mobile device.” See Petition at 25-29. Here the Petition conclusorily declares that a POSITA purportedly would have “appreciated the advantages of utilizing ... real-time communication in emergency situations” such as “allow[ing] the user to quickly and accurately convey the nature of their emergency.” *Id.* at 27-28. At best, however, this addresses only whether it would have been obvious to use real-time video as one of the means of communication during an emergency. It says nothing at all about simultaneous audio and real-time

video communications. Again, the claims here require more than just video communication. The emergency dispatcher must engage in both audio and WebRTC real-time video communication with a mobile device at the same time. See, e.g., '383 patent, claim 1. Moreover, the Petition cites noting—besides a single expert declaration paragraph—in support of its assertion. Petitioner's expert declaration includes a verbatim recitation of same conclusory statement from the petition. See Ex. 1003, ¶¶ 95-97. Expert testimony that “merely repeats, verbatim, the conclusory assertion for which it is offered to support,” and “does not cite to any additional supporting evidence or provide any technical reasoning [in] support” is entitled to no weight. *Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 at 15 (PTAB Aug. 24, 2022) (precedential).

So, in sum, the Petition has done nothing more than (1) point to Ramanujaiaha's teaching of “concurrent” or “multimodal” communications, and (2) list out the various different communication methods identified in Ramanujaiaha. This falls well short of showing obviousness. There is no discussion of the how or why of the proposed combination. “Obviousness concerns whether a skilled artisan not only could have made but would have been motivated to make the combinations or modifications of prior art to arrive at the claimed invention.” *Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064, 1073 (Fed. Cir. 2015).

The Federal Circuit’s decision in *Virtek Vision Int’l ULC v. Assembly Guidance Sys.*, 97 F.4th 882 (Fed. Cir. 2024) is instructive. This case involved a patent claiming an improved method for aligning a laser and work surface. *Id.* at 885. The claims required the identification of a target pattern using a 3D coordinate system. *Id.* at 886. The prior art at issue separately referenced (1) identifying target patterns using angular direction and (2) both angular direction and 3D coordinate systems. *Id.* The Board held that the existence of these teachings in the prior art rendered the claims “obvious to try.” *Id.* Federal Circuit reversed, determining that the Board erred. The Federal Circuit explained that “[i]t does not suffice to meet the motivation to combine requirement” to simply point to “alternative arrangements” that were “known in the art.” *Id.* “The mere fact that these possible arrangements existed in the prior art does not provide a reason that a skilled artisan” would have combined the arrangements in the way the claims required. *Id.* at 887. More evidence—such as an identified common-sense reason for combination, a discussion of a market need, or an explanation of why there are only a finite number of identified, predictable solutions—is required. *See id.*

The Petition here makes the very same type of deficient showing. It merely references Ramanujaiaha’s separate teachings of audio calls and real-time video. There is no explanation of or evidence showing why these things would be used together in the way the claims require. There is no discussion of common sense.

There is no explanation of why Ramanujaiaha includes a finite number of identified, predictable solutions. Indeed, Ramanujaiaha embraces virtually every known method of communication, from telephone calls over a PSTN network, email, social media messages, chat, to video. *See, e.g., Ramanujaiaha*, 9:46-52. There is also no evidence of any sort of design need or market pressure for a system that engages in simultaneous audio and real-time video communication as the '383 patent's claims require. In short, there is no evidence—or even explanation—of motivation. It follows that the claims have not been shown to be obvious.

“An IPR is an expedited administrative procedure, driven by the invalidity theories presented in a petition.” *Axonics, Inc. v. Medtronic, Inc.*, 75 F.4<sup>th</sup> 1374, 1380 (Fed. Cir. 2023). Thus, the *petition itself* must “identify ‘in writing and with particularity ... the grounds on which the challenge to each claim is based, and the evidence that supports the grounds for the challenge to each claim.’” *Id.* (quoting 35 U.S.C. § 312(a)(3)). An instituted IPR proceeding is not an opportunity for a petitioner to develop evidence of unpatentability. That evidence must be *in the petition*. *See id.* The Petition here fails to present the required evidence showing a motivation to combine Ramanujaiaha's various teachings to arrive at the claimed method and system that simultaneously engages in audio and real-time video communication. Institution must be denied.

## 2. *Ground 2*

Ground 2 in the Petition argues that claims 1-20 of the '383 patent are obvious in view of the combination of Ramanujaiaha and Krishnan. *See* Petition at 1. Krishnan does not resolve the issues with Ramanujaiaha. Once again, there is nothing in the prior art—or the Petition—explaining why a POSITA would have been motivated to simultaneously engage in audio and WebRTC real-time video communication between a caller and recipient during an emergency.

Here, the Petition spends pages explaining why Krishnan purportedly makes it obvious to “establish a WebRTC session” to allow for “real-time communication in emergency situations.” *Id.* at 54-60. The Petition also argues that Krishnan purportedly teaches ““sending video of an emergent event”” “while ‘audio communications’ are provided via ‘voice-only channel[.]’” *Id.* at 63-64 (quoting Krishnan, 11:28-31); *see also id.* at 47 (alleging that “Krishnan ... utilizes multiple data channels to enable the user to maintain a voice call with the emergency center while sending video footage of the emergent event.”)

There is no such disclosure in Krishnan. Krishnan does discuss a system that allows an “emergency caller” to “establish a trusted data channel (e.g., a WebRTC call) with a PSAP system” to “provide their perspective about” an emergency event. Krishnan, 1:39-44; *see also id.*, 7:33-35 (similarly referencing use of a “WebRTC ... data channel paradigm”). Transmitted data can include “pictures, videos, text

information, etc.” *Id.*, 1:44-46. The purpose of this, however, is allow for “call triage” (*i.e.*, “to prioritize which of the calls will make it to an agent”). *Id.*, 1:25-32; *see also id.*, 1:39-42 (similarly explaining that the “secondary channel” is used for “prioritizing calls in a contact center”). “The PSAP” thus “can use information incoming from each of the data channels” to “determine which caller gets through to the PSAP agent first and which caller waits.” *Id.*, 1:44-49; *see also id.*, 1:57-60 (“information obtained from the various data channels may then help the PSAP resources to determine which calls are a priority and which calls can be ignored”). Put another way, in Krishnan data (like video) is communicated before there is audio communication between a caller and an emergency dispatcher.

According to the Petition, “Figure 3” of Krishnan “illustrates” a “real-time video stream ... received through the WebRTC session while audio content of the emergency call is received through the first connection.” Petition at 64. The Petition identifies step 302 (“Establish a data channel connection”) as a “WebRTC Session” and step 316 (“First communication”) as a “voice-only channel.” *Id.* (citing Krishnan, Fig. 3). This is also wrong. There is no depiction of simultaneous voice and video communications. Figure 3—like the rest of Krishnan—discloses a sequential, ordered process. Step 302 represents the initial “data connection ... with PSAP server 216.” *Id.*, 9:13-16. Step 316’s “First communication” is not an initially made voice call (or even a voice call at all). It is the data transmitted from first caller

204 to the PSAP server over the data connection established in preceding steps 302-304. This collected data is then used to determine call connection priority in later steps. *See id.*, 9:66-10:20 (“Step 320” entails “evaluat[ing] information received from one or more first PSAP caller” and “second PSAP caller” at steps 316 and 318 to “reprioritize the queue order” for call connection). There is no “voice-only” communication depicted as preceding step 302 in Figure 3, let alone a “voice-only” communication that continues “while” video is also being transmitted.

This adds nothing to the obviousness analysis. Krishnan references communication via WebRTC. But so does Ramanujaiaha. Krishnan discusses the collection of “data” (like pictures, videos, and text) from an emergency caller. But it does so for purposes of call prioritization before connecting the caller with an emergency dispatcher. The Petition is once again devoid of any explanation of or evidence showing how this renders the claimed simultaneous audio and real-time video communications with a recipient obvious. As was the case in Ground 1, the portion of the Petition in Ground 2 discussing the limitation requiring that “the real-time video stream is received through the WebRTC session while audio content of the emergency call is received” does not even mention motivation to combine. *See* Petition at 62-64. Petitioner’s expert likewise fails to address this issue. *See* Ex. 1003, ¶¶ 192-193.

Rather than presenting evidence of motivation to combine, both Petitioner and its expert appear to simply assume that Ramanujaiaha and Krishnan already expressly disclose simultaneous audio and real-time video communications. Neither reference includes any such disclosure. As explained, Ramanujaiaha only identifies WebRTC real-time video as a potential means to initiate communication with a contact center (and not a second form of communication that occurs during an already ongoing audio call). And Krishnan discusses the use of WebRTC and video transmission to engage in call triage and prioritization before conducting an audio emergency call. Simply because these references mention WebRTC, and detail systems that allow for various types of communications between a caller and a call center (or an emergency dispatcher) at various times does not mean the claims are obvious. It is not enough to point to separate, unconnected teachings in the prior art. Petitioner presents the Board with nothing that would allow it to conclude from these disparate prior art teachings that it would have been obvious to simultaneously engage in audio and WebRTC real-time video communication as the claims here require. Once again, Petitioner has not met its burden.

### **III. CONCLUSION**

For the reasons outlined above, Patent Owner submits that *inter partes* review must be denied.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: October 17, 2025

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**CERTIFICATE OF WORD COUNT**

The undersigned certifies that the foregoing reply complies with the type-volume limitation in 37 C.F.R. § 42.24. According to the utilized word-processing system's word count, the reply contains 4,787 words.

Dated: October 17, 2025

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## **CERTIFICATE OF SERVICE**

The undersigned hereby confirms that the foregoing paper was caused to be served on October 17, 2025 via email upon counsel for Petitioner at the addresses indicated:

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