

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC  
Petitioner

v.

K.MIZRA LLC  
Patent Owner

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Case No. IPR2025-01436  
Patent 8,234,705

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**PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST  
FOR DISCRETIONARY DENIAL**

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## I. INTRODUCTION

Petitioner Google LLC respectfully requests denial of Patent Owner's Request for Discretionary Denial ("PO Request") for at least the following reasons.

This IPR presents an exceptional case of *unsettled* expectations following an earlier IPR challenge filed by a different party (Cisco) that terminated earlier this year by settlement with Patent Owner K.Mizra. While the PTAB's Final Written Decision ("FWD") in the Cisco IPR initially upheld the Challenged Claims, the CAFC on appeal determined that the PTAB's rationale for upholding the claims "was rooted in legal error and a fact finding unsupported by substantial evidence" and vacated the determination that Cisco failed to show unpatentability. EX1017. Patent Owner opted to settle the Cisco IPR rather than resolve unsettled questions of unpatentability. Patent Owner then filed its complaint (EX2019) against Google which precipitated this IPR.

Discretionary denial is unwarranted. First, Patent Owner cannot possibly have settled expectations concerning the validity of the '705 Patent given that the CAFC decision issued just last year and the Cisco IPR terminated earlier this year. Second, there are no settled expectations because Patent Owner took ownership in December 2019 and delayed asserting the '705 Patent against Google until earlier this year. Third, the USPTO's material error during examination outweighs any settled expectations. Fourth, Patent Owner's prior efforts to enforce the patent were

inconclusive as to patentability such that expectations regarding the patent's validity remain unsettled. Fifth, the Challenged Claims are unpatentable under both parties' litigation constructions which supports institution, not denial. Sixth, any earlier trial date is outweighed by PTO material error and the CAFC remand, and the relatively early stage of the parallel litigation and absence of overlap in light of the Sotera stipulation weigh against discretionary denial. This IPR constitutes a judicially efficient means to resolve the invalidity of the '705 Patent.

## **II. DISCRETIONARY DENIAL IS NOT WARRANTED**

The PTAB should deny Patent Owner's Request for Discretionary Denial.

### **A. There Are No Settled Expectations in Light of the CAFC's Criticism of the PTAB's Rationale for Upholding the Challenged Claims**

The '705 Patent was previously challenged in an IPR filed by Cisco. While the Cisco FWD (EX1016) initially upheld the claims, the CAFC on appeal determined that the PTAB panel's obviousness rationale "was rooted in legal error and a fact finding unsupported by substantial evidence", "vacate[d] the ultimate determination that Cisco failed to show" unpatentability, and remanded for further consideration by the PTAB. EX1017, p.13.

Patent Owner opted to settle the IPR and related litigation rather than resolve the matter before the PTAB on remand. EX1018. Patent Owner cannot now assert that it has settled expectations given the Board's previous determination that there

is a reasonable likelihood that the challenged claims are unpatentable (*see* EX1028) and the CAFC’s criticism of the PTAB’s rationale for upholding the claims which was rendered *just last year*. Patent Owner’s decision to settle the Cisco IPR *earlier this year* rather than resolve the matter on remand demonstrates its unsettled expectations with regard to the validity of the ’705 Patent. The same can be said about the prior Cisco litigation, where Patent Owner again opted to settle rather than face determination of the validity issue. EX1029.

Patent Owner asserts that *Treasure Garden, Inc., v. Atleisure, LLC*, IPR2025-01005, Paper 11 (PTAB Oct. 3, 2025), stands for the proposition that “prior [IPR] challenges favor denial.” PO Request, pp.9-10. However, in *Treasure Garden*, the previous IPR *was denied institution on the merits. Id.*, pp.2-3. In the present case, the Cisco IPR was *instituted* (*see* EX1028) and parties were awaiting decision on remand in view of the CAFC’s unequivocal criticism of the PTAB’s rationale for upholding the claims (e.g., “rooted in legal error and a fact finding unsupported by substantial evidence.”) when the case settled.

Patent Owner also misplaces reliance on *United Fire*. In *United Fire*, the CAFC *affirmed* the Board’s decision that the petitioner failed to meet its burden with respect to two grounds and remanded to resolve two non-instituted grounds. *United Fire Prot. Corp. v. Engineered Corrosion Sols., LLC*, IPR2018-00991, Paper 10, pp.8-9 (PTAB Nov. 15, 2018). Here, the CAFC in the Cisco IPR appeal did not

affirm but rather vacated the PTAB's decision and criticized the PTAB's rationale for upholding the claims (*see* EX1017). Further, *United Fire* involved evidence that “strongly suggested that Petitioner used this information [from the previous IPR] ‘as a roadmap’ ... by curing deficiencies the Board identified in the [previous] IPR.” Here, Petitioner's Grounds rely on different prior art than what was at issue in the Cisco IPR.

Patent Owner's speculation concerning Petitioner's purported “partnerships” with Cisco and HPE has no relevance to the discretionary denial inquiry. First, this IPR challenge was brought due to Patent Owner's piecemeal litigation strategy of serially asserting the '705 Patent against various defendants (first against Cisco and HPE, now against Google)—not to some alleged partnership between Google and Cisco/HPE implicating the '705 Patent. Indeed, Cisco/HPE and Patent Owner have already settled. Second, Patent Owner does not even assert much less demonstrate with evidence that the subject of any purported “partnership” has anything to do with the subject matter of the '705 Patent. Third, Patent Owner has alleged infringement of completely unrelated products. EX2019, pp.14-15 (accusing Google's “Google Chrome Enterprise Premium” and “BeyondCorp Enterprise”); EX1030, pp.10-21 (accusing Cisco's “Identity Service Engine”). Fourth, Patent Owner does not assert or provide supporting evidence demonstrating that Google was somehow involved in the previous Cisco IPR. Patent Owner's assertion that Google should have joined

the Cisco IPR fails for the same reasons. Patent Owner did not assert the '705 Patent against Google at the time of the Cisco IPR and instead waited until earlier this year to do so which precipitated this IPR.

**B. There Are No Settled Expectations Given that Patent Owner Took Ownership in December 2019 and Delayed Assertion Against Google**

Patent Owner K.Mizra asserts that settled expectations exist because the '705 Patent issued on July 31, 2012. However, K.Mizra took ownership of the '705 Patent in December of 2019 which is less than 6 years ago from the filing of this IPR. EX1025 (Assignment from Network Security Technologies, LLC to K.Mizra LLC). *See also* EX2019, p.2 (conceding K.Mizra took ownership “by assignment”). Patent Owner cannot assert that settled expectations stem from the July 31, 2012 issue date of the '705 Patent given that Patent Owner did not even own the patent until *over seven years* after its issuance.

Furthermore, after obtaining ownership, Patent Owner K.Mizra asserted the '705 Patent against Cisco in 2020 (*see* EX1030) and against HPE, Forescout, and Fortinet in 2021 (*see* EX1033, EX1026, EX1027). But Patent Owner opted not to sue Google at that time but instead waited until February *of this year* (after settlement of the previous action) to assert the '705 Patent against Google (EX2019). Patent Owner asserts that Google’s “Google Chrome Enterprise Premium” and “BeyondCorp Enterprise” products infringe the patent. EX2019, pp.14-15. Google’s

“BeyondCorp Enterprise” has been available since 2021 (*see* EX1031) yet Patent Owner waited until this year to sue Google. Google had settled expectations that Patent Owner would not assert the ’705 Patent against Google given Patent Owner’s prior assertion against numerous defendants which occurred years earlier.

**C. The USPTO’s Material Error During Examination Outweighs Any Settled Expectations**

Review is warranted in view of the USPTO’s material error in allowing the claims. The Ground set forth in the Petition is based on prior art (Freund, Ball, Pujare) that was neither considered nor substantively discussed by the Patent Office during prosecution of the ’705 Patent. *See* EX1001, p.1 (References Cited). Patent Owner concedes this. PO Request, p.17 (“Here, only Lewis was cited in prosecution.”). The Challenged Claims are unpatentable in view of the Ground for the reasons explained in the Petition (*see* Section VII). The Patent Office materially erred by overlooking the relevant disclosures of Freund, Ball, Pujare, and Lewis that demonstrate unpatentability. Patent Owner makes no assertion that the IPR Ground is cumulative to issues considered during examination. Indeed, the Ground substantially differs given that Freund, Ball, and Pujare were neither considered nor addressed.

Patent Owner’s material error analysis centers on the Patent Office’s prior treatment of Lewis. PO Request, pp.17-19. As to Freund, Ball, and Pujare, Patent Owner dismisses these references as irrelevant to the material error inquiry given

that the PTO never considered such prior art during prosecution. That is, according to Patent Owner, material error is limited to situations where the Office considered a prior art reference and misapprehended disclosures of that considered prior art. Patent Owner is wrong. Material error is not limited to such narrow circumstances. In this regard, Patent Owner concedes that “the ‘material error’ inquiry has its roots in the Advanced Bionics’ case” where the PTAB stated that “[a]n example of material error may include[e] misapprehending or *overlooking specific teachings of the relevant prior art where those teachings impact patentability of the challenged claims.*” *Advanced Bionics, LLC v. Med-El Elektromedizinische Geräte GmbH*, IPR2019-01469, Paper 6, p.8 (PTAB Feb. 13, 2020) (precedential). That is precisely what occurred during prosecution where the Examiner overlooked the teachings of relevant prior art (Freund, Ball, Pujare) that impact patentability of the Challenged Claims. The Board has found material error under the same circumstances. *See, e.g., Anthony, Inc. v. ControlTec, LLC*, IPR2025-00636, Paper 9, p.2 (PTAB July 16, 2025) (referring the Petition to the Board where “Petitioner persuasively explains that the patent examiner erred by overlooking the teachings of Carter”), Paper 8, p.16 (Petitioner’s opposition explaining that “Carter was not considered at all during prosecution”).The PTAB also overlooked the combination of Lewis with Freund, Ball, and Pujare.

The PTAB has determined that even “strong settled expectations” can be outweighed by PTO material error, and such is the case here. *See, e.g., Xencor, Inc. v. Merus N.V.*, IPR2025-00604, Paper 12, pp.2-3 (PTAB Jul. 17, 2025) (referring petition to the Board where “the challenged patent has been in force for approximately nine years . . . , creating strong settled expectations for Patent Owner” but where “Petitioner provides persuasive reasoning, supported by evidence, that discretionary denial . . . is not appropriate because the Office materially erred during prosecution of the challenged patent.”). Any finding of settled expectations is outweighed by the clear material error during examination in overlooking Freund, Ball, and Pujare. As previously explained (*see* Pet., pp.10-11), the Examiner stated that Liang and Yan fail to anticipate or render obvious “serving both the specific quarantine notification page with the DNS redirection when in combination with the remaining claim limitations.” EX1002, p.21. This Petition cites prior art that was overlooked by the Examiner which clearly discloses the allowable subject matter. *See Anthony*, IPR2025-00636, Paper 9, p.2 (“Petitioner persuasively explains that the patent examiner erred by overlooking the teachings of Carter. ***Although the challenged patents have been in force for approximately eighteen and seventeen years***, Petitioner appears to show a material error by the Office, and it is an appropriate use of Office resources to review the potential error.”) (emphasis added).

*See also Embody, Inc. v. LifeNet Health*, IPR2025-00248, Paper 13 (PTAB June 26, 2025).

**D. Patent Owner’s Prior Efforts to Enforce the Patent Were Inconclusive as to Patentability Such that Expectations Regarding the Patent’s Validity Remain Unsettled**

Patent Owner asserts that its alleged “long history of enforcement of the ’705 Patent” creates settled expectations. PO Request, p.2. Patent Owner is wrong. First, as explained above, this “long history of enforcement” culminated in *the CAFC remand* which created unsettled expectations as to the validity of the ’705 Patent. Second, the history of enforcement by Patent Owner is as a non-practicing entity with no efforts to commercialize, and Patent Owner admits this. EX2019, page 2 (Patent Owner’s Complaint admitting that “K.Mizra is a patent licensing company ... [that] focuses on high-value, high-quality patents and owns patent portfolios originating from a wide array of inventors). EX2019, page 2. The absence of commercialization by Patent Owner further weighs against denial. *See, e.g., Intel Corp. v. Proxense LLC*, IPR2025-00327, Paper 12, pp.2-3 (PTAB Jun. 26, 2025) (non-commercialization is a factor weighing against a claim of settled expectations). *See also Shenzhen Tuozhu Technology Co., Ltd. v. Stratasys, Inc.*, IPR2025-00438, Paper 10 (PTAB July 17, 2025). Third, Patent Owner’s complex and diverse litigations stemming from its piecemeal litigation tactics (*see* EX1030, EX1033, EX1026, EX1027) weigh against denial. *See, e.g., Tesla, Inc. v. Intellectual Ventures*

*II LLC*, IPR2025-00221, Paper 9, p.2 (PTAB June 13, 2025) (“Petitioner’s arguments regarding the complex and diverse litigation proceeding tip the balance against discretionary denial.”).

**E. The Challenged Claims Are Unpatentable Under Both Parties’ Litigation Constructions—This Is Reason for Institution, Not Denial**

The Petition demonstrates unpatentability under both Petitioner’s and Patent Owner’s constructions proffered in the Related Litigation. This demonstrates the strength of the merits and is reason for institution, not denial, as Patent Owner contends.

Patent Owner alleges that “Petitioner fails to take any position on claim construction” and “improperly offers competing constructions.” PO Request, p.12. Patent Owner is wrong. The Petition sets forth both Petitioner’s and Patent Owner’s constructions from the Related Litigation and unequivocally states that the prior art cited in the Petition discloses the terms under both Petitioner’s and Patent Owner’s proposed constructions. Pet., pp.16-20. That is, whether the claims are construed under Petitioner’s or Patent Owner’s proposed constructions in the litigation does not matter—*the claims are invalid under both interpretations*.

Patent Owner asserts that “Petitioner is really asking the Board to re-do claim construction that has already been done by the district court.” PO Request, p.13. Patent Owner again is wrong. Petitioner is not asking the Board for a re-do—the

claims are unpatentable under either parties' litigation constructions. Of course, in the event the Board adopts one or more of Petitioner's constructions, Petitioner has demonstrated that the claims are unpatentable under those constructions as well. The Petition was filed on September 19, 2025, *prior to the issuance of the Markman Order* (EX2011) which issued on October 28, 2025. Petitioner addressed both parties' constructions given that at the time the Petition was filed, the District Court had not yet rendered its Markman Order.

Moreover, the Markman Order construed the disputed terms (i.e., "protected network" (EX2011, page 12), "trusted computing base" (*id.*, page 20), "valid digitally signed attestation of cleanliness" (*id.*, page 23), "includes at least one of an . . . and at least one of an . . ." (page 28), "quarantine" or "quarantining" (*id.*, page 33), "quarantine server" (*id.*, page 38), and "a remediation host configured to provide data usable to remedy the insecure condition" (*id.*, page 43). That the Petition expressly addresses the district court's constructions constitutes further reason to institute.

Patent Owner faults Petitioner for not "setting forth which construction(s) it believes are correct" but again misses the point. The particular construction—whether Petitioner's or Patent Owner's construction from the litigation, or to the extent Patent Owner or the Board raises new construction issues in the IPR—does not matter given that the claims are unpatentable under both constructions proffered

by the parties in the Related Litigation and any other construction, as was clearly explained in the Petition.

Patent Owner faults Petitioner for stating that the claims are invalid under “other constructions”. PO Request, p.12. But Patent Owner fails to appreciate that the “other constructions” contemplates situations where the Patent Owner raises new claim construction issues and/or the Board raises a claim construction issue on its own. *These situations are expressly contemplated in the Trial Practice Guide. See Trial Practice Guide, Section II.B.6.* (“The petitioner may respond to any such new claim construction issues raised by the patent owner”, “If the Board raises a claim construction issue on its own, both parties will be afforded an opportunity to respond before a final written decision is issued.”).

**F. The Parallel Litigation Does Not Warrant Discretionary Denial**

The parallel litigation does not warrant discretionary denial. As explained above, the USPTO committed material error in issuing the '705 Patent. This outweighs any earlier district court trial date. *See, e.g., Microsoft Corporation v. ParTec AG f/k/a Partec Cluster Competence Center GMBH*, IPR2025-00318, Paper 9, p.3 (PTAB June 12, 2025) (“Although the scheduled district court trial is set to precede the expected final written decision due date ..., discretionary denial of institution is not warranted because of Petitioner’s showing of material error during patent examination.”). *See also Padagis US LLC v. Neurelis, Inc.*, IPR2025-00464,

Paper 12, p.3 (PTAB July 16, 2025) (“Ordinarily, a scheduled district court trial date that precedes the date projected for a Board final written decision weighs in favor of exercising discretion to deny the Petition. Here, however, the Petitioner appears to show a material error by the Office, and it is an appropriate use of Office resources to review the potential error.”).

Furthermore, the Fintiv factors themselves do not warrant discretionary denial or at the very least are neutral. Factor 1 is neutral given that no party has requested a stay, and the District Court has not indicated whether a stay is likely to be granted. Concerning Factor 2, the PTAB has long held that a scheduled trial date itself is not dispositive. Because much can change in eleven months, the current trial date does not support denial. *See DISH Network v. Broadband iTV*, IPR2020-01280, Paper 17, p.16 (PTAB Feb. 4, 2021) (“We cannot ignore the fact that the currently scheduled trial date is more than nine months away and much can change during this time”).

Concerning Factor 3, the district court is at an early stage with the complaint having been filed in February 2025. Fact discovery is scheduled to close on May 26, 2026, expert discovery is scheduled to close on July 21, 2026, and dispositive motions are due on August 4, 2026—all well after the date the institution decision is projected to issue in March 2026 in this IPR. EX2007. Altogether, there is much work to be done in the district court and most of the work will be well in the future. Accordingly, the district court will not invest significant resources related to the

challenged patent prior to the issuance of an institution decision. *See Fintiv*, IPR2020-00019, Paper 11 at 9-12; *DISH Network*, IPR2020-01280, Paper 17 at 18-21. Accordingly, this factor favors institution or, at the very least, is neutral.

Concerning Factor 4, Petitioner has submitted a *Sotera* stipulation (Paper 6). Therefore, this factor favors institution. Patent Owner complains that the *Sotera* stipulation is a “nullity.” PO Request, pp.8-9. Patent Owner is wrong. Petitioner’s language merely clarifies the circumstances for triggering the stipulation by expressly contemplating situations where the PTAB terminates an IPR proceeding without issuing a final written decision, e.g., the action taken in *Interactive Communications International, Inc. v. Blackhawk Network Inc.*, IPR2024-00465, Paper 39 (PTAB Oct. 1, 2025). To be clear, the stipulation does not extend to scenarios where the USPTO institutes but later vacates institution of IPR2025-01436, or otherwise terminates the proceeding without issuing an appealable Final Written Decision, as those scenarios would no longer involve an instituted *inter partes* review. Thus, if IPR2025-01436 is not instituted, is instituted but later de-instituted, or otherwise terminates without an appealable Final Written Decision, Petitioner reserves the right to pursue in the Related Litigation any ground that was raised or reasonably could have been raised in IPR2025-01436.

Concerning Factor 5, overlap of parties is neutral as it is “far from an unusual circumstance that a petitioner in inter partes review and a defendant in a parallel

district court proceeding are the same.” *Sand Revolution*, IPR2019-01393, Paper 24 at 12-13. Concerning Factor 6, the Ground presents a compelling case of unpatentability and the merits of the Petition are strong. The challenges presented in this Petition are particularly compelling given that the Ground is a straightforward obviousness challenge based on express teachings found in the prior art. *See, e.g., Inergy Tech., Inc. v. Force Mos Tech., Co., Ltd.*, IPR2024-00094, Paper 9 (PTAB May 21, 2024) at p. 36 (finding compelling merits where the obviousness ground is “seemingly straightforward” and “Petitioner’s motivation for this modification comes from an express teaching in [the cited reference]”). The Ground asserted herein was not previously considered by either the Office or the district courts, also favoring institution. *See Comcast Cable Commn’s, LLC v. Rovi Guides, Inc.*, IPR2019-00231, Paper 14 at 11 (PTAB May 20, 2019) (obviousness challenges not “previously considered by the Office or any court” weigh in favor of not denying institution).

**G. The Petition Clearly Demonstrates Unpatentability of the Challenged Claims**

Patent Owner asserts that the Petition does not explain where the prior art discloses Element [1.9]. PO Request, pp.18-19. Patent Owner is wrong. The Petition unequivocally states that Freund discloses and suggests Element [1.9] (*see* Pet., p.38) and explains how Freund discloses this subject matter (*see, e.g.,* Pet., pp.38-44 (quoting EX1005, ¶¶[0148]-[0150])).

Patent Owner asserts that Petitioner's reliance on Pujare is unclear, but Patent Owner again is wrong. As is evident from the Petition, Pujare constitutes evidence that a POSITA would have understood that a "version" is synonymous with, and suggests, a "patch or patch level" as claimed. *See* Pet., p.14. Pujare is cited as evidence that Freund's disclosure of security software "versions" would have been understood as a disclosure of a "patch or patch level" associated with a software component. Pet., pp.34, 63.

PO's assertion concerning Petitioner's reliance on Lewis (*see* PO Request, pp.15-16) is also incorrect. The Petition clearly states that Lewis is cited for disclosing an alternative embodiment discussed in the '705 Patent. The Petition states that "Lewis discloses an alternate method of DNS redirection" (Pet., p.14) and that "Petitioner merely relies on Lewis as an alternative technique to the technique disclosed by Freund" for DNS redirection. Pet., p.15. The Petition unequivocally states that Freund itself discloses and suggests Element [1.9] and that Lewis is cited as "one example" of DNS redirection and discloses "one of the numerous ways" of DNS redirection referenced by the '705 Patent "should it be argued that the claim is somehow limited to the non-limiting exemplary embodiments" in the '705 Patent. Pet., pp.41-42. There is nothing unclear or improper about Petitioner's reliance on Lewis.

### III. CONCLUSION

For at least the foregoing reasons, Patent Owner's Request for Discretionary Denial should be denied.

Date: December 23, 2025

Respectfully submitted,

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APPENDIX A – LIST OF EXHIBITS

<b>Exhibit No.</b>	<b>Description</b>
1001	U.S. Patent No. 8,234,705, issued July 31, 2012
1002	File History of U.S. Patent Application No. 11/237,003
1005	U.S. Patent Publication No. 2003/0055962, published March 20, 2003 to G. Freund <i>et al.</i> (“Freund”)
1016	Final Written Decision, <i>Cisco Systems, Inc. et al. v. K.Mizra LLC</i> , IPR2021-00593, Paper 41 (PTAB Sep. 19, 2022)
1017	Federal Circuit Decision vacating Final Written Decision issued in IPR2021-00593 and remanding to PTAB, <i>Cisco Systems, Inc. et al. v. K.Mizra LLC</i> , 2022-2290, 2023-1183 (Fed. Cir. Aug. 16, 2024)
1018	Order Terminating Due to Settlement After Institution of Trial, <i>Cisco Systems, Inc. et al. v. K.Mizra LLC</i> , IPR2021-00593, Paper 51 (PTAB Jan. 30, 2025)
1025	Recorded Patent Assignment recorded at Reel 051499, Frames 0047-0050 on January 13, 2020
1026	Complaint filed July 8, 2021 in <i>K.Mizra LLC v. Fortinet, Inc.</i> , Civ. Action No. 2:21-cv-00249 (E.D. Tex.)
1027	Complaint filed July 8, 2021 in <i>K.Mizra LLC v. Forescout Technologies Inc.</i> , Civ. Action No. 2:21-cv-00248 (E.D. Tex.)
1028	Institution Decision in <i>Cisco Systems, Inc. et al. v. K.Mizra LLC</i> , IPR2021-00593, Paper 9 (PTAB Sep. 24, 2021)
1029	Order of Dismissal with Prejudice filed October 7, 2024 in <i>K.Mizra LLC v. Cisco Systems, Inc.</i> , Civ. Action No. 6:20-cv-01031 (W.D. Tex.)
1030	Complaint filed November 6, 2020 in <i>K.Mizra LLC v. Cisco Systems, Inc.</i> , Civ. Action No. 6:20-cv-01031 (W.D. Tex.)

Exhibit No.	Description
1031	Google's "BeyondCorp Enterprise" available at <a href="https://cloud.google.com/blog/products/identity-security/new-beyondcorp-enterprise-zero-trust-capabilities">https://cloud.google.com/blog/products/identity-security/new-beyondcorp-enterprise-zero-trust-capabilities</a> (downloaded December 22, 2025)
1033	Complaint filed August 9, 2021 in <i>K.Mizra LLC v. Hewlett Packard Enterprise Company et al.</i> , Civ. Action No. 2:21-cv-00305 (E.D. Tex.)
2007	Scheduling Order, <i>K.Mizra LLC v. Google LLC</i> , 1:25-cv-00236-ADA (W.D. Tex.) (ECF No. 39)
2011	Claim Construction Order and Memorandum in Support Thereof, <i>K.Mizra LLC v. Google LLC</i> , 1:25-cv-00236-ADA (W.D. Tex.) (ECF No. 57)
2019	Complaint for Patent Infringement, <i>K.Mizra LLC v. Google LLC</i> , 1:25-cv-00236-ADA (W.D. Tex.) (ECF No. 1)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of December, 2025, a true and correct copy of the foregoing **PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL** is being served upon Patent Owner's counsel via electronic as follows:

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