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Subject: RE: IPR2026-00182, -00184 (Microsoft v. Qomplx): Petitioner's Request for Preliminary Replies
Date: Monday, April 27, 2026 3:42:50 PM
Attachments: [image001.png](#)
[image002.png](#)

Counsel,

Petitioner is authorized to file a 5-page preliminary reply in each of IPR2026-00182 and IPR2026-00184, due no later than April 30, 2026, limited to addressing the claim terms Petitioner identifies in their email below. Patent Owner is authorized to file a 5-page preliminary sur-reply in IPR2026-00182 and IPR2026-00184 due no later than May 5, 2026, limited to addressing the same issues.

The parties should file their briefs as papers in P-TACTS. The parties are not authorized to file any evidence at this time.

Regards,

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Sent: Monday, April 20, 2026 11:51 PM
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Subject: IPR2026-00182, -00184 (Microsoft v. Qomplx): Petitioner's Request for Preliminary Replies

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Dear Honorable Director,

In each of IPR2026-00182 and -00184, Petitioner Microsoft respectfully requests authorization to file a ten-page reply to the Patent Owner Preliminary Response to address Patent Owner's claim construction arguments. See IPR2026-00182, Paper 12 ("182 POPR"); IPR2026-00184, Paper 11.

Good cause exists because the POPRs advance new narrowing claim-scope positions, supported in significant part by testimonial and other extrinsic evidence, that are inconsistent with the intrinsic evidence. Petitioner had no notice of these positions prior to filing the Petitions on December 30, 2025, and in district court Patent Owner only advances the second position below, first identifying that position on March 2, 2026. Petitioner promptly informed Patent Owner of its intent to seek these replies within a week of receiving the POPRs. Should the Board grant this request, Petitioner would not oppose an equal-length sur-reply by Patent Owner in each IPR.

Petitioner seeks to address the following constructions advanced in each POPR:

- 1. "multidimensional time-series database"** (e.g., 182 POPR at 9-14). The POPRs argue that "multidimensional time-series database" requires a specialized database "optimized or especially suited" for time-series data, relying heavily on an expert declaration (EX2023) and additional extrinsic materials (EX2024–EX2031). Petitioner could not have foreseen this extrinsic evidence-based construction at least because it is inconsistent with intrinsic evidence not cited by Patent Owner.
- 2. Order of steps for "determine whether an additional verification is required" and "receive a request to authenticate"** (e.g., 182 POPR at 14-28). The POPRs argue that the recited "determine" step must "occur after and in response to" the recited "receive" step. Petitioner could not have foreseen this construction at least because it is contradicted by logic and the specification. *E.g.*, EX1001, 5:5-9. Petitioner seeks an opportunity to address that narrowed order-of-steps theory and explain its inconsistency with the claims and specification.
- 3. "select an additional verification method from a plurality of verification methods"** (e.g., 182 POPR at 30-41). The POPRs both mischaracterize the combination presented in the Petition and rely on testimonial and other extrinsic evidence to read the claimed "verification method" in an unduly narrow manner that collapses materially different code-based implementations into a single monolithic "method." Petitioner could not have foreseen these arguments because they run counter to the claim's plain meaning and the specification. Petitioner seeks an opportunity to respond to that reading, which is inconsistent with the specification's discussion of one-time-use codes as a verification-method category and that "[v]arious implementations of the one-time-use code are presently used in the art." EX1001, 11:21-27.

Petitioner should be allowed a reply to address these newly advanced positions, including showing why they are inconsistent with the intrinsic record and why the grounds presented in the Petition satisfy the claims even under these unduly narrow constructions. Because Patent Owner alleges these issues are dispositive, focused briefing from both sides will aid the Director in making the institution decision.

Petitioner has conferred with counsel for Patent Owner, which opposes this request and provided the following position: Patent Owner objects to Petitioner's email which contains improper argument in violation of the Board's rules and fails to show good cause. Petitioner has the burden to address claim construction and should have addressed reasonably foreseeable issues in the Petition. Patent Owner

does not advance new claim constructions but applies the claims consistent with the intrinsic record and responds to Petitioner's positions. The request is also untimely, addresses multiple issues, and seeks excessive pages. To the extent any request is granted, Patent Owner requests a sur-reply of equal length.

Respectfully submitted,

Andy Mason
Lead Counsel for Petitioner Microsoft

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