

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**PALO ALTO NETWORKS, INC., CISCO SYSTEMS, INC., and
KEYSIGHT TECHNOLOGIES, INC.**
Petitioners,*

v.

CENTRIPETAL NETWORKS, INC.,
Patent Owner.

Case IPR2022-00182

U.S. Patent No. 9,917,856

**PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION FOR
RECUSAL AND VACATUR**

*Cisco Systems, Inc. filed a petition and a motion for joinder in IPR2022-01151 and has been joined as a petitioner in this proceeding. Keysight Technologies, Inc. filed a petition and a motion for joinder in IPR2022-01199 and has been joined as a petitioner in this proceeding

LIST OF EXHIBITS

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EX1002	File History of U.S. Patent No. 9,917,856 (“’856 FH”)
EX1003	Declaration of Dr. Jon Weissman in Support of <i>Inter Partes</i> Review of U.S. Patent No. 9,917,856 (“Weissman”)
EX1004	U.S. Patent No. 9,680,795 (“Buruganahalli”)
EX1005	U.S. Patent No. 5,878,231 (“Baehr”)
EX1006	<i>Reserved</i>
EX1007	Barry M. Leiner et al., “A Brief History of the Internet,” Internet Society, 1997, available at: https://www.internetsociety.org/internet/history-internet/brief-historyinternet/ (“Leiner”)
EX1008	U.S. Pat. No. 7,032,031 (“Jungck ’06”)
EX1009	E. H. Spafford, “The Internet Worm Program: An Analysis,” Purdue Technical Report CSD-TR-823, 1988. (“Spafford”)
EX1010	Eichin, M.W. and Rochlis, J.A., “With Microscope and Tweezers: The Worm from MIT’s Perspective,” Communications of the ACM, Volume 32 Number 6, June 1989 (“Eichin”)
EX1011	T. Eisenberg et al., “The Cornell Commission: On Morris and the Worm,” Communications of the ACM, Volume 32 Number 6, June 1989 (“Eisenberg”)
EX1012	J. C. Mogul, “Simple and Flexible Datagram Access Controls for Unixbased Gateways,” Digital Western Research Laboratory Technical Report No. 89/4, 1989 (“Mogul”)
EX1013	“FireWall-1 User Interface from 3.0,” PhoneBoy’s Security Theater, archived at the Internet Archive Wayback Machine on January 2, 2014 at

Exhibit No.	Description
	https://web.archive.org/web/20140102143305/http://phoneboy.net/ (“FireWall-1”)
EX1014	“SonicWALL Global Management System: Centralized Network Monitoring and Management Solution”, 2008, archived at the Internet Archive Wayback Machine on December 7, 2008 at https://web.archive.org/web/20081207003303/http://www.sonicwall.com/downloads/EC_GMS_DS_US.pdf (“SonicWALL GMS”)
EX1015	“SonicWALL ViewPoint 6.0 Administrator’s Guide”, 2010, archived at the Internet Archive Wayback Machine on August 21, 2010 at https://web.archive.org/web/20100821022839/http://www.sonicwall.com:80/downloads/SonicWALL_ViewPoint_6_0_Admin_Guide.pdf (“SonicWALL ViewPoint”)
EX1016	Heberlein, L. T.L, et al., “A Network Security Monitor,” Proceedings, 1990 IEEE Computer Society Symposium on Security and Privacy, 1990 (“Heberlein”)
EX1017	“NetRanger Network Security Management System User Guide”. v1.3.1 Wheelgroup Corporation, 1997 (“NetRanger”)
EX1018	Roesch, M., “Snort: Lightweight Intrusion Detection for Networks,” Lisa (Vol. 99, No. 1, pp. 229-238), 1999 (“Roesch”)
EX1019	U.S. Pat. No. 8,370,936 (“Zuk”)
EX1020	W32.hllw.Doomjuice Technical Description, Symantec Security Center, updated February 13, 2007, available at: https://www.symantec.com/security-center/writeup/2004-020909-2916-99 (“Doomjuice”)
EX1021	“(Vendor Issues Fix) Re: Helix Universal Server and RealServer URL Parsing Flaw in View Source Plug-in Lets Remote Users Execute Arbitrary Code with Root Privileges” Security Tracker, September 13, 2003, available at: https://securitytracker.com/id/1007692 (“Helix”)

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EX1022	“Transmission Control Protocol,” IETF RFC 793. J. Postel, ed., September 1981, archived at Internet Archive Wayback Machine on February 2, 2007 at https://web.archive.org/web/20070202201546/https://tools.ietf.org/html/rfc793 (“RFC 793”)
EX1023	“Internet Protocol,” IETF RFC 791, J. Postel, ed., September 1981, archived at Internet Archive Wayback Machine on February 4, 2007 at https://web.archive.org/web/20070204151303/https://tools.ietf.org/html/rfc791
EX1024	“File Transfer Protocol,” IETF RFC 765, J. Postel, ed., June 1980, archived at Internet Archive Wayback Machine on February 6, 2007 at https://web.archive.org/web/20070206005843/https://tools.ietf.org/html/rfc765 (“RFC 765”)
EX1025	T. B. Lee, “The Original HTTP as defined in 1991,” World Wide Web Consortium, 1991, archived at Internet Archive Wayback Machine on June 5, 1997 at https://web.archive.org/web/19970605071155/https://www.w3.org/Protocols/HTTP/AsImplemented.html (“T.B. Lee”)
EX1026	<i>Cisco System Inc. v. Centripetal Networks, Inc.</i> , IPR2018-01760, Paper 41 (PTAB May 18, 2020)
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EX1030	<i>Centripetal Networks, Inc. v. Keysight Techs., Inc.</i> , Case No. 2:17-cv-383 (E.D. Va.), Dkt No. 484 (“Keysight Markman”)
EX1031	S. Turner & C. Polk, “Prohibiting Secure Sockets Layer (SSL) Version 2.0,” IETF RFC 6176, March 2011, archived at Internet Archive Wayback Machine on March 18, 2011 at https://web.archive.org/web/20110318184421/https://tools.ietf.org/html/rfc6176 (“Turner”)
EX1032	I. Ristic, “SSL/TLS and PKI History,” April 2018, available from https://www.feistyduck.com/ssl-tls-and-pki-history/ (“Ristic”)
EX1033	U.S. Pat. Appl. Pub. No. 2007/0271605 (“Le Pennec”)
EX1034	U.S. Patent No. 8,504,822 (“Wang”)
EX1035	U.S. Patent No. 7,793,342 (“Ebrahimi”)
EX1036	J. Wack et al., <i>Guidelines on Firewalls and Firewall Policy</i> , National Institute of Standards and Technology (“NIST”)
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EX1043	U.S. Patent No. 7,849,502 (“Bloch”)
EX1044	U.S. Patent No. 7,584,352 (“Boivie”)
EX1045	Young-Ho Kim, et al., <i>Design of Firewall in Router using Network Processor</i> , IEEE (Jul. 11, 2005) (“Kim”)
EX1046	Declaration of Jonathan Bradford

Exhibit No.	Description
EX1047	Declaration of Andrew Radsch in Support of Motion for <i>Pro Hac Vice</i> Admission
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EX1050	<i>Centripetal Networks, Inc. v. Cisco Systems, Inc.</i> , No. 2021-1888, (Fed. Cir. 2022).
EX1051	Request for Comments: 3507, Internet Content Adaptation Protocol (ICAP), April 2003
EX1052	Goodrich, M. T., & Tamassia, R. (2011). <i>Introduction to Computer Security</i> , ch. 6. London, UK: Pearson.
EX1053	Declaration of Jonathan Bradford ISO Petitioner's Reply
EX1054	<i>Centripetal Networks, Inc. v. Cisco Systems, Inc.</i> , No. 22-246, (Nov. 9, 2022), On Petition for Writ of Certiorari to the United States Court of Appeals for the Federal Circuit, Reply Brief for Petitioner.
EX1055	Declaration of Jonathan Bradford ISO Petitioner's Opposition to PO's Motion for Recusal and Vacatur

Patent Owner's ("PO") Motion (Paper 37) is premised on a supposed, yet legally unsupported, conflict by APJ McNamara with respect to Cisco Systems, Inc. ("Cisco"). But Cisco was not a party to this proceeding when it was filed or when it was instituted. Cisco became a party to this proceeding through joinder only on January 4, 2023. Paper 39, 64. And despite having no obligation to do so under controlling regulations, APJ McNamara withdrew one day later. Paper 43, 3. Accordingly, PO's demand for recusal by APJ McNamara is moot.

PO's Motion also argues for the extreme position that the institution of this IPR—a preliminary decision—must be vacated because Cisco was litigating the '856 patent in a different forum at the same time that Palo Alto Networks ("PAN") sought and obtained IPR of this patent. There was no conflict at institution because Cisco was not a party to this proceeding, nor in any way involved.¹ And for that

¹ Petitioner acted independently in pursuing this IPR and did not coordinate with Cisco or any other party. Paper 9, 4. Petitioner produced voluntary discovery to PO in this proceeding, *see id.*, and in IPR2021-01520 and -01521, establishing that there was no coordination or involvement by Cisco. In a teleconference on February 10, 2022, PO complained that the voluntary discovery was insufficient and asked the Board to grant a request to file a motion for additional discovery. The Board asked PO to narrow its discovery requests and to work out its differences with Petitioner.

reason, among others, there is no merit to PO's attempt to draw parallels to a Federal Circuit decision that involved a district court judge's conflict with a party to the underlying proceeding, and that was governed by statute not applicable here.

Even if Cisco were involved at institution, and it plainly was not, PO has acknowledged—in briefing to the Supreme Court, no less—that 5 C.F.R. §2640.202(a) expressly permits APJs to maintain investments under \$15,000, without conflict. *See* Exhibit 1054, 8 (PO arguing that 5 C.F.R. §2640.202(a) permits the possession of publicly traded stock that does not exceed \$15,000 and that this regulation “by its terms ***applies to the PTAB and its APJs.***”) (emphasis in original). PO's decision to argue the exact opposite here a few weeks later, without informing the Board that PO had recently argued the exact opposite, in contravention of PO's duty of candor, is indicative of the length to which PO will go in an attempt to intimidate the panel into confirming its unpatentable claims.

Although not required by controlling regulation, as PO has acknowledged, PO will now receive a Final Written Decision from a panel that does not include APJ

IPR2021-01520, Ex. 2047, at 28:5-29:2. But PO never did and instead abandoned its request for additional discovery—seemingly in recognition that any such additional discovery would only crystallize the record that there was no coordination between Petitioner and Cisco. *See* Paper 9, 4.

McNamara, but instead will include a different judge that will review a full trial record not present at the time of the preliminary decision to institute. In effect, PO has already received relief that goes beyond anything it is entitled to as a matter of “due process.” Even setting aside the plain language of the regulation that would control in any event, there is no justification to vacate a preliminary record that did not involve Cisco. PO’s Motion should be denied.

I. THERE WAS NO ACTUAL CONFLICT OR APPEARANCE OF IMPROPRIETY AT INSTITUTION

There was no actual conflict or appearance of impropriety at institution. At the time of institution, Cisco was neither a party nor real-party-in-interest and had not asked to join this proceeding. Any alleged financial interest APJ McNamara had in Cisco at the time of institution—putting aside the controlling regulations permitting certain financial interests—is irrelevant. It was only after the institution decision that Cisco filed a motion to join this proceeding. IPR2022-01151, Paper 3. Over seven months after the institution decision, Cisco was granted permission to join. IPR2022-00182, Paper 39. That decision granting Cisco’s motion to join was based on the existing record, which did not involve Cisco, and there have been no decisions from the APJs in this proceeding that issued in the interim. As soon as Cisco joined, APJ McNamara immediately withdrew from the panel (even though it was unnecessary, as discussed below). IPR2022-00182, Paper 43.

The facts and law here are inapposite to the Federal Circuit’s decision vacating a judgment from a litigation involving Cisco as a party, based on the district court judge’s wife’s holding of Cisco stock. There, the sole district court judge had a known conflict with a party to the litigation when issuing the final judgment. Ex. 1050, 2-7. Here, in contrast, Cisco was not a party at the time of the preliminary decision to institute that PO urges should be vacated. As such, there is no factual support for the existence of any actual conflict or appearance of impropriety that would warrant recusal of the entire panel and vacatur of the preliminary institution decision. Further, the law applicable in that district court proceeding governing the recusal of district court judges, 28 U.S.C. § 455, *see* Ex. 1050, 4-5, is not applicable to these proceedings—and even if it were, there was no disqualifying conflict because Cisco was not a party to the proceeding.²

Finally, the retirement plan payments to APJ McNamara are irrelevant to impartiality, as that plan is independently administrated by a third party, Foley & Lardner LLP (“Foley”), and PO has not alleged that more than \$15,000 of the

² PO’s position that an APJ may not be involved in a proceeding that concerns a patent that is also at issue in a different proceeding, in a different forum, if the APJ has some purported conflict with a party to that other proceeding, finds no support in any cited law.

payment to APJ McNamara is directly attributable to Cisco. As APJ McNamara explained in his recusal, Foley has no interest in the outcome of this proceeding and no Foley attorney has participated in the proceeding. Paper 43, 2. Furthermore, the payments were not tied to the success of any matter involving Cisco. *Id.* There is no basis for a finding that the retirement plan payments impute APJ McNamara with a financial interest in Cisco—but even if there were, that would be irrelevant to PO’s request for vacatur of the institution decision since Cisco was not a party to the proceeding at that time.

II. PATENT OWNER HAS ACKNOWLEDGED TO THE SUPREME COURT THAT 5 C.F.R. §2640.202(a) CONTROLS, CONTRARY TO ITS ARGUMENTS TO THE PTAB

The applicable federal regulation controls and APJ McNamara is compliant with it. 5 C.F.R. § 2640.101 governs whether an officer or employee of the executive branch is permitted to participate in certain matters to “prevent an employee from allowing personal interests to affect his official actions, and to protect governmental processes from actual or apparent conflicts of interests.” 5 C.F.R. § 2640.101. The regulation acknowledges that, “in certain cases, the nature and size of the financial interest and the nature of the matter in which the employee would act are unlikely to affect an employee’s official actions.” *Id.* Accordingly, a specific exemption is explicitly provided under the regulation. Specifically, 5 C.F.R. § 2640.202(a) states:

De minimis exemption for matters involving parties. An employee may participate in any particular matter involving specific parties in which the disqualifying financial interest arises from the ownership by the employee... of securities issued by one or more entities affected by the matter, if:

- (1) The securities are publicly traded...; and
- (2) The aggregate market value of the holdings of the employee... in the securities of all entities does not exceed \$15,000.

Thus, even assuming Cisco was considered a party to the preliminary proceeding, or an entity affected by it, APJ McNamara's ownership of Cisco stock that is publicly traded and does not exceed \$15,000 is exempt under 5 C.F.R. § 2640.202(a) by its express terms, and non-disqualifying.

Just two months ago, PO made this very same point to the United States Supreme Court. There, PO represented to the Supreme Court that this regulation, 5 C.F.R. § 2640.202(a), applies to APJs. In a reply brief to its petition seeking writ of certiorari from the Supreme Court on the Federal Circuit's decision to vacate the judgement in the Cisco district court litigation, PO wrote:

Federal regulations ***permit*** government employees to participate in matters involving parties in which they possess a financial interest if (1) "[t]he securities are publicly traded" (or are long-term government bonds) and (2) the value of the interest "does not exceed \$15,000." 5 C.F.R. §2640.202(a). This rule by its terms ***applies to the PTAB and its APJs.***

Exhibit 1054, 8 (emphasis added and in original). PO also called the regulation “the relaxed stock-ownership rules” that are enjoyed by APJs. Exhibit 1054, 9. And, it appears that the genesis of PO’s argument there was based on the same underlying facts as here—APJ McNamara’s purported financial interest in Cisco. *See id.*

Following the Supreme Court’s denial of its certiorari petition in December, PO now argues the exact opposite to the Board—and without informing the Board of its earlier, contrary arguments to the Supreme Court. PO also offers no explanation for its delay in raising the issue. *See* Ex. 2029, ¶2 (“I received [a copy of APJ McNamara’s Public Financial Disclosure Reports] on or about September 29, 2022.”). The timing suggests that PO’s delay was intentional while it waited for a Supreme Court decision, which would support a finding of waiver.

For these numerous reasons, PO’s arguments lack merit and should be denied.

III. VACATUR WOULD BE IMPROPER

Before Cisco was joined as a party, including at the time of institution, APJ McNamara cannot be argued to have had a conflict here. After Cisco was joined as a party, while regulations permit APJ McNamara to continue (as PO acknowledged to the Supreme Court), he immediately withdrew to simplify the briefing here.³

³ APJ McNamara’s immediate withdrawal also distinguishes the *Williams* case cited by PO. *See* Paper 37, 13. There, the “justice in question denied the prisoner’s

Paper 43, 3. Therefore, any allegation of a speculative conflict is moot. Because there is no conflict in fact, or under the controlling federal regulation, no remedy is warranted.

To be sure, there is no basis for PO's request to vacate the preliminary institution decision and recuse the remaining two APJs on the panel. Because APJ McNamara had no actual conflict, there had never been any "shadow" that would cast over the entire panel of the APJs in this proceeding, as PO alleges. Paper 37, 12. Furthermore, unlike the Federal Circuit decision to vacate a final judgment from the district court, a decision that was governed by statute, the Board's decision to institute is a preliminary finding; there is no final decision. For example, the institution decision states, "[a]t this preliminary stage, we have not made a final determination about the patentability of any challenged claim, the construction of any claim term, phrase, or limitation, or any other legal or factual issue." Paper 11, 90. PO had an opportunity to enter evidence during trial and to secure a favorable result on the merits. And unlike the Federal Circuit decision to vacate a final decision issued by a single district court judge, the preliminary institution decision was issued by a panel of three judges, and any of the three judges could have issued

motion for recusal and participated in the decision to deny relief." *Williams v. Pennsylvania*, 136 S. Ct. 1899, 1903 (2016).

a dissent, yet they all agreed.⁴ Lastly, the record reflects that APJ McNamara is impartial.⁵ For example, PO acknowledged that APJ McNamara has denied institution on petitions challenging PO's patents in the past, which would be against Cisco's interest. Ex. 2029, ¶7. In any event, PO (though unwarranted) is getting a different judge to preside over the remainder of the proceeding and to issue the Final Written Decision.⁶ Any additional relief would be highly prejudicial to PAN and without cause.

⁴ And even if the remaining two judges were to recuse themselves or otherwise be replaced—an extraordinary and unnecessary remedy that appears to be without precedent—there is no basis for vacatur of the institution decision that issued long before Cisco was joined as a party to the proceeding.

⁵ PO's attempt to show "bias" fails. Paper 37, 4-5. PO selectively presents statistics without explaining how the underlying data was gathered or analyzed, without addressing whether any underlying patents were involved in PO's litigation against Cisco, without attempting to show that any differences in institution rates are statistically significant, and without even acknowledging that there could be other reasons for the institution decisions (such as, for example, their respective merits).

⁶ APJ's McNamara's absence from the panel going forward also satisfies PO's request for "a neutral and detached judge in the first instance." Paper 37, 14 (quoting

This case was instituted based on the well-reasoned analysis of the Board and its finding that “the merits of Petitioner’s challenge to the ‘856 patent seem ‘particularly strong.’” Paper 11, 21. Putting aside that no controlling regulation was violated, the extraordinary remedy of vacatur would allow Centripetal’s patent to remain in force without the Board completing its evaluation of the challenge, and counter the intent behind IPRs of improving patent quality. *See* H.R. Rep. No. 112-98, pt. 1, at 40 (2011); 2011 U.S.C.C.A.N. 67, 69; S. Rep. No. 110-259, at 20 (2008) (the congressional intent behind the AIA was “to establish a more efficient and streamlined patent system that will improve patent quality and limit unnecessary and counterproductive litigation costs”). The public interest in removing patents that do not support innovation also weighs against vacatur.

For the foregoing reasons, PO’s motion should be denied in its entirety.

Ward v. Vill. of Monroeville, Ohio, 409 U.S. 57, 61-62 (1972)). The Court in *Ward* found that a trial court’s conflict was not remedied by the availability of an impartial appellate court. *Ward*, 409 U.S. at 61-62 (“any unfairness at the trial level can be corrected on appeal.... We disagree.”). Here, the tribunal of first instance—the PTAB—will issue its final decision without the participation of the allegedly conflicted judge.

Dated: January 13, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION FOR RECUSAL AND VACATUR, was served in its entirety by filing through the Patent Trial and Appeal Case Tracking System (PTACTS), as well as providing a courtesy copy via e-mail to the following attorneys of record for Patent Owner listed below:

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