

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, LLC,
Patent Owner.

Case IPR2022-00182
U.S. Patent No. 9,917,856

**PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW
OF FINAL WRITTEN DECISION ON REMAND**

*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.

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. FACTUAL BACKGROUND.....	2
III. ARGUMENT	4
A. The Board Effectively Reinstated the Decision the Federal Circuit Vacated.....	4
1. The Panel Overlooked the Federal Circuit’s Prejudice Analysis, Which Instructed the Board to Reconsider the Case in its Entirety	4
2. The Federal Circuit’s Vacatur Was Broad, not Narrow	5
3. The Board Erred in Considering Objective Indicia of Nonobviousness in Isolation	7
4. The Board’s Failure to Follow SOP-3 Compounded the Prejudice.....	9
B. The Board’s <i>Sua Sponte</i> Construction of the Packet Filtering Rules Limitation Violated the APA and Contradicts the Record	9
1. The Board Violated the APA by Adopting an Unbriefed Prosecution History Theory to Decide the Filtering Limitation.....	9
2. The Director Should Reverse the Remand FWD Because it Inverted the Parties’ Burdens and Misread the Record	11
C. The Board’s <i>Sua Sponte</i> Construction of “URI” to Encompass Mere Domain Names Violates the APA and Is Unsupported by the Record.....	12
IV. CONCLUSION.....	15

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Apple Inc. v. Corephotonics, Ltd.</i> , No. 2022-1340, 2023 WL 5838695 (Fed. Cir. Sept. 11, 2023).....	11, 14
<i>Axonics, Inc. v. Medtronic, Inc.</i> , 75 F.4th 1374 (Fed. Cir. 2023)	10
<i>Centripetal Networks, LLC v. Palo Alto Networks, Inc.</i> , 156 F.4th 1368 (Fed. Cir. 2025)	3
<i>Engel Industries, Inc. v. Lockformer Co.</i> , 166 F.3d 1379 (Fed. Cir. 1999)	5
<i>Facebook, Inc. v. Express Mobile, Inc.</i> , No. IPR2021-01226, Paper 65 (Director Order, May 1, 2026).....	6
<i>Facebook, Inc. v. Express Mobile, Inc.</i> , No. IPR2021-01226, Paper 68 (P.T.A.B. June 25, 2026)	7
<i>Graham v. John Deere Co.</i> , 383 U.S. 1 (1966).....	7
<i>Hayward Indus., Inc. v. Pentair Water Pool & Spa, Inc.</i> , 814 F. App'x 592 (Fed. Cir. 2020)	6
<i>Liqwd, Inc. v. L'Oreal USA, Inc.</i> , 941 F.3d 1133 (Fed. Cir. 2019)	8
<i>In re Piasecki</i> , 745 F.2d 1468, 1472 (Fed. Cir. 1984)	7
<i>Qualcomm Inc. v. Intel Corp.</i> , 6 F.4th 1256 (Fed. Cir. 2021)	10
<i>In re Rinehart</i> , 531 F.2d 1048, 1052 (CCPA 1976).....	7
<i>In re Magnum Oil Tools Int'l, Ltd.</i> , 829 F.3d 1364 (Fed. Cir. 2016)	11, 12

<i>Microsoft Corp. v. Parallel Networks Licensing, LLC</i> , No. IPR2015-00483, Paper 92 (P.T.A.B. Sept. 29, 2020).....	6, 7
--	------

<i>SAS v. Iancu</i> , 584 U.S. 357 (2018).....	11
---	----

Statutes

Administrative Procedure Act.....	<i>passim</i>
-----------------------------------	---------------

Other Authorities

37 C.F.R. 42.104(b)(3)-(4).....	11
---------------------------------	----

I. INTRODUCTION

The '856 Patent addresses a critical problem in network security: filtering threats hidden in encrypted traffic *without decrypting it*. Centripetal's invention flags a threat from the unencrypted start of a session, then filters the later encrypted packets by correlating them into the same session. The Board's decision still rests on a critical mistake: the Board did not believe the '856 Patent disclosed packets could be filtered without decrypting them. So the Board read the claims as if they covered filtering decrypted data—exactly what the Buruganahalli reference does. Every error in the Remand FWD flows from this misapprehension.

Centripetal requests that the Director vacate or reverse the Remand FWD for three independent reasons. First, the Board misinterpreted the Federal Circuit's mandate, which vacated the Original FWD in its entirety and remanded for full reconsideration. Second, the Board's dispositive finding on a packet-filtering limitation rests on a *sua sponte* written description theory that no party advanced, in direct violation of the APA. Third, the Board's *sua sponte* construction of "URI" likewise violated the APA and was unsupported by any evidence.

The Remand Panel's misinterpretation of the remand scope alone requires vacatur. But the Director should go further and reverse the Remand FWD. Each of the Board's errors is legal and dispositive, and the Director should reverse and confirm claims 1, 24, and 25 of the '856 Patent are patentable. This case has already

been remanded once, with a mandate for a new panel to provide a fresh look at the merits. Yet the new decision returned with the same result, even incorporating the erroneous, vacated prior decision. A further remand would compound, not cure, the injury to Centripetal. If the Remand FWD is vacated rather than reversed, the Director should order a full, independent merits analysis on the existing record and hold a new Oral Hearing.

II. FACTUAL BACKGROUND

The technology at issue has already been the subject of extensive litigation. A district court found that Cisco copied Centripetal's patented technology based on the very copying evidence introduced into this proceeding. Ex. 1027 at 149–52, 155–57. Cisco itself had characterized the problem of filtering encrypted traffic as “unsolvable,” yet after taking Centripetal's RuleGATE technology under NDA, Cisco built the technology into its own products. Ex. 2013 at 1. That verdict was later vacated on recusal issues.

On May 23, 2023, the Board issued a Final Written Decision determining that claims 1, 24, and 25 of the '856 Patent were unpatentable as obvious in view of Buruganahalli. Paper 67 (“Original FWD”). The Original FWD rested on a fundamental misunderstanding of the claimed technology: the Original Panel held that “it does not appear possible to apply some of those rules to encrypted packets” and that “there is nothing in the patent that explains how to apply those rules to a

packet without decrypting it first.” *Id.* at 3, 22. In effect, the Board concluded that the invention was impossible, and then construed the claims to cover the prior art’s decryption-based approach. Centripetal appealed to the Federal Circuit.¹

On October 22, 2025, the Federal Circuit vacated the Original FWD after determining that the Board “failed to properly consider evidence of copying” and remanded “for further proceedings consistent with this opinion,” with a suggestion to “assign this case to new APJs.” *Centripetal Networks, LLC v. Palo Alto Networks, Inc.*, 156 F.4th 1368, 1372, 1380–81 (Fed. Cir. 2025) (hereinafter, Paper 72 (“CAFC Opinion”)).

¹ At oral argument, Chief Judge Moore remarked “I really don’t like the Board’s opinion where it comes awfully close to doing something with regard to written description. . . . Boy, there’s a lot in there that feels like it does not belong there and is not appropriate for the Board to do I really think they came very close on that written description thing to doing something that seems really not appropriate.” *Centripetal Networks, LLC v. Palo Alto Networks, Inc.*, No. 23-2027 (Fed. Cir. Feb. 6, 2025), oral arg. at 46:10–46:48, <https://www.cafc.uscourts.gov/02-07-2025-2023-2027-centripetal-networks-llc-v-palo-alto-networks-inc-audio-uploaded/>.

On December 30, 2025, the parties requested a teleconference with the Board pursuant to SOP-3. Ex. 3018. That teleconference never happened. Instead, a new panel was assigned (“Remand Panel”), and on June 11, 2026, the Remand Panel issued a Final Written Decision on Remand, again finding all challenged claims unpatentable. Paper 78 (“Remand FWD”).

Rather than conduct the independent review the Federal Circuit’s vacatur demanded, the Remand Panel declared that “[t]he sole issue on remand is whether ‘the evidence of copying’ is sufficient to overcome the obviousness ground of unpatentability over Buruganahalli,” and “substantially incorporate[d] the analysis of the prior Decision”—the very decision the Federal Circuit had vacated. Remand FWD at 4.

III. ARGUMENT

A. The Board Effectively Reinstated the Decision the Federal Circuit Vacated

The Director should reverse or, at the least, vacate, the Remand FWD because it is irreconcilable with the scope of the Federal Circuit’s remand and with binding precedent establishing that objective indicia of nonobviousness cannot be analyzed in isolation as a “secondary” afterthought to the obviousness analysis.

1. The Panel Overlooked the Federal Circuit’s Prejudice Analysis, Which Instructed the Board to Reconsider the Case in its Entirety

Vacatur is necessary because the Remand Panel fundamentally misinterpreted the scope of the Federal Circuit’s Remand. The Court did not remand on the narrow

sub-issue of “copying” (Remand FWD at 4); it vacated the Original FWD in its entirety to ensure that Centripetal would suffer no prejudice from an interested APJ who issued merits decisions before recusing himself. CAFC Opinion at 17 (“[B]ecause we ultimately vacate the final written decision on the merits, the Board will have another opportunity to consider this case.”). The Court found only a low risk of prejudice because it expected the Board to start fresh. Yet the Remand Panel declared that “[t]he sole issue on remand is whether ‘the evidence of copying’ is sufficient to overcome the obviousness ground,” and “substantially incorporate[d] the analysis of the prior Decision below.” Remand FWD at 4. The Federal Circuit vacated the Original FWD; the Remand Panel effectively reinstated it. On this basis alone, the Board’s decision cannot stand.

2. The Federal Circuit’s Vacatur Was Broad, not Narrow

The Board relied on *Engel Industries, Inc. v. Lockformer Co.*, 166 F.3d 1379, 1383 (Fed. Cir. 1999) for the proposition that “all issues within the scope of the appealed judgment are deemed incorporated within the mandate and thus are precluded from further adjudication.” Remand FWD at 4. But *Engel* is inapposite. That principle operates only on issues within an *affirmed* judgment. 166 F.3d at 1383. Where, as here, a reviewing court vacates a judgment in its entirety, there is no “scope of the appealed judgment” to incorporate because the judgment no longer exists. The Remand Panel itself recognized this when it gave no weight to the district

court's vacated factual findings (Remand FWD at 39) yet simultaneously treated the vacated Original FWD as settled law. Every *Graham* factor and all merits issues were open on remand.

Hayward Industries, Inc. v. Pentair Water Pool & Spa, Inc., 814 F. App'x 592, 597-98 (Fed. Cir. 2020) confirms this point: When the Federal Circuit intends a narrow remand, it uses narrow language and remands on a single limitation. Here, by contrast, the Federal Circuit vacated the Original FWD in its entirety and remanded for "further proceedings consistent with this opinion." CAFC Opinion at 17, 20.

The Director's recent order in *Facebook, Inc. v. Express Mobile, Inc.*, No. IPR2021-01226, Paper 65 (Director Order, May 1, 2026), is directly on point. There, the Director held that the Federal Circuit's vacatur of a final written decision in its entirety meant it was error for the Board to limit itself to a single narrow sub-issue rather than give "due consideration" to other dispositive issues. *Id.* at 3–4. Both mandates used identical language, vacating the entire decision for "further proceedings consistent with this opinion." *Id.* at 3; CAFC Opinion at 20.

When "the court instruct[s] [the Board] to conduct particular inquiries during further proceedings, the decision does not restrict [the Board] to considering only those issues," "especially so" when the remand is for "further proceedings consistent with" the decision. *Microsoft Corp. v. Parallel Networks Licensing, LLC*, No.

IPR2015-00483, Paper 92 at 9-10 (P.T.A.B. Sept. 29, 2020). Likewise, in *Facebook*, the Director found that the Mandate was not limited and directed the case to a delegated rehearing panel, which vacated the final written decision on remand. No. IPR2021-01226, Paper 68 (P.T.A.B. June 25, 2026) (vacating the FWD on Remand). The same conclusion is compelled here.

3. The Board Erred in Considering Objective Indicia of Nonobviousness in Isolation

Even assuming, *arguendo*, that the Federal Circuit directed only a copying-focused remand, the Board's approach was legally deficient. The Board prejudged the outcome: It declared that "Buruganahalli presents a strong case of obviousness and, in fact, is essentially anticipatory" before evaluating any objective indicia, then assessed each item of copying evidence against that predetermined conclusion. Remand FWD at 32, 35–39. This is precisely the error condemned in *Graham v. John Deere Co.*, 383 U.S. 1, 17–18 (1966), which requires all four *Graham* factors to be considered together as part of a unified analysis. The Federal Circuit has been explicit: Once rebuttal evidence is produced, "the holding of *prima facie* obviousness . . . is dissipated" and the factfinder "must consider all of the evidence anew." *In re Piasecki*, 745 F.2d 1468, 1472 (Fed. Cir. 1984); *In re Rinehart*, 531 F.2d 1048, 1052 (C.C.P.A. 1976) ("An earlier decision should not . . . be considered as set in concrete, and applicant's rebuttal evidence then be evaluated only on its knockdown ability.").

The Board did not consider the evidence anew—it treated the Original Panel’s conclusion as an immovable premise against which all secondary-considerations evidence was inevitably found wanting, confirming that it did not “conduct the proper analysis in the first instance.” CAFC Opinion at 20.

Separately, the Director should reverse because the Board misapplied the governing standard for copying. Remand FWD at 39-42. Evidence of actual copying, including copying accomplished through access to the patentee’s non-public, confidential information, is always relevant to obviousness and may not be disregarded. *Liqwd, Inc. v. L’Oreal USA, Inc.*, 941 F.3d 1133, 1137–39 (Fed. Cir. 2019). That is this record: Cisco obtained Centripetal’s RuleGATE technology and proprietary algorithms under NDA and, within a year, released products embodying that functionality. Ex. 1027 at 149–52, 155–57; *see* Remand FWD (Murphy, J., concurring opinion at 3) (summarizing “unrebutted evidence” of copying introduced by Patent Owner). The Board’s dismissal of that unrebutted evidence as showing only an “opportunity” to copy, rather than actual copying, applied a stricter standard than *Liqwd* permits. Remand FWD at 41-42. Properly credited and weighed with the failure of the prima facie case, it compels a conclusion of nonobviousness, and reversal.

4. The Board's Failure to Follow SOP-3 Compounded the Prejudice

SOP-3 requires parties to contact the Board within ten business days after the mandate issues to arrange a teleconference, which should take place within the first month. The parties jointly requested a teleconference on December 30, 2025. Ex. 3018. The Board never responded. The teleconference is the mechanism through which the parties and panel define the scope and procedure of remand proceedings—the very issues at the heart of this dispute. Although SOP-3 does not “create any legally enforceable rights,” the failure to hold the requested teleconference deprived Centripetal of any opportunity to address the Board’s fatally narrow view of remand scope before the Remand FWD issued. SOP-3 at 1 (https://www.uspto.gov/sites/default/files/documents/ptab_sop_3-2023-oct.pdf).

B. The Board's *Sua Sponte* Construction of the Packet Filtering Rules Limitation Violated the APA and Contradicts the Record

The Remand Panel’s finding that Buruganahalli discloses the “filtering” limitation of the challenged claims rests on a theory of the Board’s own invention that neither party advanced and which violates the Administrative Procedure Act (“APA”). This error alone warrants reversal.

1. The Board Violated the APA by Adopting an Unbriefed Prosecution History Theory to Decide the Filtering Limitation

The Board’s finding that Buruganahalli discloses the “filtering” limitation rests entirely on a prosecution history theory that no party advanced, in direct

violation of the APA. *Axonics, Inc. v. Medtronic, Inc.*, 75 F.4th 1374, 1381 (Fed. Cir. 2023); *Qualcomm Inc. v. Intel Corp.*, 6 F.4th 1256, 1263 (Fed. Cir. 2021). The Original Panel identified, *sua sponte*, a purported “problem with the examiner’s amendment,” namely that the amendment “added the rules of step 22, which are applied to decrypted data, to a claim that was drafted to cover filtering of encrypted packets.” Original FWD at 22, 43. The Original Panel then used this unbriefed theory to reach the dispositive conclusion that “the claims that issued cover Buruganahalli’s method of determining that a session should be filtered based on a domain name in unencrypted handshake data.” *Id.* at 43.

Petitioner never made this argument. The Petition identified no problem with the Examiner’s Amendment and did not argue that step 22’s decryption-based criteria defined the operative scope of the filtering limitation. To the contrary: Petitioner’s Reply characterized steps 20–22 as “unclaimed extra step[s].” Reply at 1 n.1. That characterization is the direct opposite of the Board’s dispositive holding, which treated step-22 criteria as the material incorporated into the claim language via the Examiner’s Amendment. The Board thus adopted a theory that Petitioner itself disclaimed.

Centripetal had no notice that the Board would reject Petitioner’s characterization, adopt a prosecution history theory of its own construction, and use that theory to resolve the central patentability argument against Patent Owner. *See*

Apple Inc. v. Corephotonics, Ltd., 81 F.4th 1353, 1362 (Fed. Cir. 2023) (vacating where patent owner “had no reason to anticipate” that an unbriefed issue “would be the basis for the Board’s decision”).

2. The Director Should Reverse the Remand FWD Because it
Inverted the Parties’ Burdens and Misread the Record

In an AIA trial, the burden to demonstrate unpatentability remains on the Petitioner throughout. *SAS v. Iancu*, 584 U.S. 357, 367 (2018). This includes the requirements under 37 C.F.R. § 42.104(b)(3)-(4) to construe the claims and explain how the construed claims are unpatentable. Petitioner did not advance the claim construction necessary to support the Original Panel’s decision. Pet. at 35 (citing “URL/category filtering,” “application layer filtering,” and “content scanning,” not handshake processing). Instead, Petitioner proceeded on the basis that the Challenged Claims meant what they said and cited rules applied only to decrypted packets. *Id.*

The Board’s decision to construe the Challenged Claims *sua sponte* and develop a new theory of unpatentability in its Original FWD was not merely a violation of the APA—it was a wholesale inversion of the parties’ burdens under the AIA. *In re Magnum Oil Tools Int’l, Ltd.*, 829 F.3d 1364, 1381 (Fed. Cir. 2016) (“[W]hile the PTO has broad authority to establish procedures for revisiting earlier-granted patents in IPRs, that authority is not so broad that it allows the PTO to raise, address, and decide unpatentability theories never presented by the petitioner and

not supported by record evidence.”). The Board did precisely what *Magnum Oil* prohibits.

Compounding this error, the Board dismissed Centripetal’s unrebutted explanation of how the ’856 Patent filters encrypted packets in a single footnote resting entirely on the unbriefed step-22 theory. Remand FWD at 28 n.7. Centripetal’s expert, Dr. Goodrich, explained without rebuttal that the claimed technique involves logging network threat indicators from unencrypted handshake messages (step #19) *and* from decrypted traffic (step #22), and that when future encrypted packets arrive, RuleGate correlates the encrypted packet with stored data logs containing the claimed criteria, including URIs, protocol versions, and filters them *without decryption*. Paper 24 (“POR”) at 20 (citing Goodrich Decl. at ¶¶ 64, 65) (citing ’856 Pat. at 11:36-65, discussing “[s]imilar filtering . . . on encrypted packets”); ’856 Pat. at 11:36-65 (disclosing “step #23” of filtering encrypted packets based on data stored in logs at step #22, including the claimed encrypted network threat indicators, such as URI and protocol version). Neither Panel acknowledged or addressed these unrebutted disclosures.

Director Review should be granted, and the Remand FWD holding that Buruganahalli discloses encrypted packet-filtering should be reversed.

C. The Board’s *Sua Sponte* Construction of “URI” to Encompass Mere Domain Names Violates the APA and Is Unsupported by the Record

The Director should also reverse the Remand FWD because the Board's construction of "uniform resource identifier (URI)" violated the APA and disregarded fundamental claim construction principles. Remand FWD at 28-29. The Board concluded, without support, that a URI encompasses mere domain names, and therefore that "the claims that issued cover Buruganahalli's method of determining that a session should be filtered based on a domain name in unencrypted handshake data." *Id.* The argument leading to this conclusion was raised by Petitioner for the first time at the Oral Hearing and contradicts copious, unrebutted record evidence.

First, the Board held that Centripetal's argument that there is "no URI (or URL) in Buruganahalli's handshake message" was "waived, because it was not raised earlier." Remand FWD at 28–29. This waiver finding is flatly wrong. In the POR, Centripetal expressly argued that encrypted packets must be decrypted to determine whether the domain name extracted from the handshake message matches the domain name in the URL. POR at 46 (citing Ex. 1004 at 8:20-22; Goodrich Decl., ¶¶ 96-100). Centripetal raised this argument in its briefing; the Board simply ignored it.

Second, ***Petitioner's*** argument that the URL is found in the unencrypted handshake message should have been deemed waived because it was raised for the first time at the Oral Hearing, and neither the Original nor Remand FWD found

otherwise. Paper 66 (“Hearing Tr.”) at 48:15-50:15; Original FWD at 43 (citing no evidence that Petitioner ever raised this argument before the Oral Hearing); Remand FWD at 28-29 (same).

The Federal Circuit has recognized that a patent owner cannot be expected to anticipate and rebut arguments that a petitioner has not yet made. *Apple*, 81 F.4th at 1362 (vacating where patent owner “had no reason to anticipate” that an unbriefed issue “would be the basis for the Board’s decision”). Where a petitioner advances a new theory at oral argument, the proper course is to disregard the petitioner’s untimely argument, not to penalize the patent owner for responding to novel, conclusory assertions with undisputed record evidence, including Petitioner’s own admissions. The Board’s asymmetric application of its own timeliness rules, which credited Petitioner’s unsupported and untimely argument while simultaneously deeming Centripetal’s immediate, evidence-based rebuttal waived, is indefensible and warrants reversal.

Third, the Board’s *sua sponte* construction violated fundamental claim construction principles. When Petitioner raised this argument at the Oral Hearing, Centripetal’s counsel immediately objected that “Petitioners never make[] an argument that a domain name is a URL,” and “[t]his is the first time that we’re hearing it today.” Hearing Tr. at 58:24-60:7. Centripetal directed the Board to unrebutted record evidence—including Petitioner’s own expert testimony and the

Magee reference—demonstrating that a domain name is not a URI or URL, and that URIs/URLs are found only in encrypted portions of HTTPS packets. *See, e.g.*, Ex. 1003, ¶¶ 64, 127; Ex. 1037 at 4:13–44; POR at 46 (citing Goodrich Decl., ¶ 100).

The Board’s construction was a textbook violation of the law. The Board did not examine the ’856 Patent specification, the prosecution history, or any technical standard, dictionary, or expert testimony on the meaning of “URI.” It simply declared, without analysis, that a domain name is a URI. Original FWD at 43; Remand FWD at 28. Had the Board undertaken the required analysis, it would have found the record replete with evidence—including Petitioner’s own references and expert testimony—that contradicts its conclusory determination.

The construction was adopted in violation of the APA, is unsupported by any evidence in the record, and is affirmatively contradicted by the evidence that is in the record. It cannot stand.

IV. CONCLUSION

For each of the foregoing independent reasons, Director Review should be granted. The Remand FWD should be reversed on the merits or, at a minimum, vacated with instructions for a new panel to conduct a full, independent merits review on the existing record, with a new Oral Hearing to afford Centripetal the due process it has been denied.

Request for Director Review of FWD on Remand
IPR2022-00182 (U.S. Patent No. 9,917,856)

Respectfully submitted,

Dated: July 13, 2026

/James Hannah/

James Hannah (Reg. No. 56,369)
HERBERT SMITH FREEHILLS
KRAMER (US) LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
james.hannah@hsfkramer.com

Jeffrey H. Price (Reg. No. 69,141)
Jenna Fuller (Reg. No. 74,212)
HERBERT SMITH FREEHILLS
KRAMER (US) LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000
jeffrey.price@hsfkramer.com
jenna.fuller@hsfkramer.com

(Case No. IPR2022-00182)

Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), and pursuant to agreement by the parties that filing with the Board through the Patent Trial and Appeal Case Tracking System (P-TACTS) constitutes electronic service, that service was made on the Petitioner as detailed below.

<i>Date of service</i>	July 13, 2026
<i>Manner of service</i>	Electronic Mail and Electronic Filing with the Board
<i>Documents served</i>	PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW OF FINAL WRITTEN DECISION ON REMAND
<i>Persons served</i>	Adam Kwon Andrew T. Radsch MUNGER, TOLLES & OLSON LLP adam.kwon@mto.com andrew.radsch@mto.com

Counsel for Palo Alto Networks, Inc.

Theodore M. Foster
David L. McCombs
Gregory P. Huh
HAYNES AND BOONE, LLP
ipr.theo.foster@haynesboone.com
david.mccombs.ipr@haynesboone.com
gregory.huh.ipr@haynesboone.com

Counsel for Cisco Systems, Inc.

Gerard M. Donovan
Peter J. Chassman
Jonathan I. Detrixhe
Sidharth Kapoor
REED SMITH LLP
gdonovan@reedsmith.com
pchassman@reedsmith.com
jdetrixhe@reedsmith.com
skapoor@reedsmith.com

*Counsel for Keysight
Technologies, Inc.*

/James Hannah/
James Hannah