

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,

Petitioner,

v.

CENTRIPETAL NETWORKS, INC.,

Patent Owner.

Case IPR2022-01151

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

**PATENT OWNER'S OPPOSITION TO
PETITIONER'S MOTION FOR JOINDER**

TABLE OF CONTENTS

I. INTRODUCTION.....	1
II. STATEMENT OF THE CASE.....	1
III. THE BOARD MUST DENY JOINDER BECAUSE THE PETITION RAISES NEW ISSUES.....	4
IV. THE BOARD SHOULD EXERCISE ITS DISCRETION TO DENY THE JOINDER MOTION	5
A. The Board Should Deny Joinder to Curtail Ongoing Harassment	5
B. The Board Should Deny Joinder Because Cisco is Otherwise Time Barred and Faces no Undue Prejudice.....	8
C. The Board Should Deny Joinder Under <i>Fintiv</i>	10
1. Investment in Prior Proceedings Weighs in Favor of Denial.....	10
2. The Issues Overlap Heavily with the Prior Proceedings, and the Petitioner Meritless (<i>Fintiv</i> Factors 4 and 6)	12
3. The Parties and Claims Overlap with the Prior Proceedings (<i>Fintiv</i> 5)	14
D. Other Discretionary Denial Factors Weigh in Favor of Denying Joinder (<i>Fintiv</i> 6)	14
1. Cisco’s Prior Knowledge of the Prior Art, the Unexplained Lapse of Time Before Filing, and Receipt of the POPR and Institution Decision Weigh in Favor of Denial (<i>General Plastic</i> 2-5).....	15
2. The Finite Resources of the Board Weigh in Favor of Denial (<i>General Plastic</i> 6).....	15
V. CONCLUSION	15

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Amazon.com, Inc. v. Vocalife LLC</i> , IPR2020-00864, Paper 22 (P.T.A.B. Oct. 28, 2020).....	11
<i>Apple Inc. v. Uniloc 2017 LLC</i> , IPR2020-00854, Paper 9 (P.T.A.B. Oct. 28, 2020).....	5, 10, 15
<i>Apple Inc. v. Unwired Planet Int’l Ltd.</i> , IPR2020-00642, Paper 15 (P.T.A.B. Sept. 9, 2020).....	11
<i>Centripetal Networks, Inc., v. Cisco Sys., Inc.</i> , No. 2021-1888, 2022 WL 2252638 (Fed. Cir. June 23, 2022).....	3
<i>Code200 v. Bright Data, Ltd.</i> , IPR2021-01503, Paper 13 (P.T.A.B. Mar. 14, 2022).....	9
<i>Facebook, Inc., v. Windy City Innovations, LLC</i> , 973 F.3d 1321 (Fed. Cir. 2020)	4
<i>HTC Corp. v. Ancora Techs.</i> , IPR2021-00570, Paper 17 (P.T.A.B. Jun. 10, 2021)	9
<i>In re Leithem</i> , 661 F.3d 1316 (Fed. Cir. 2011)	4
<i>In re NuVasive, Inc.</i> , 841 F.3d 966 (Fed. Cir. 2016)	5
<i>Proppant Express Invs. v. Oren Techs.</i> , IPR2018-00914, Paper 38 (P.T.A.B. Mar. 13, 2019).....	5, 6, 8
Statutes	
35 U.S.C. § 315(b).....	8
§ 315(c)	8
§ 316(b).....	7

Other Authorities

H.R. Rep. No. 112-98 (2011)	7, 8
PTAB Consolidated Trial Practice Guide (Nov. 19)	<i>passim</i>

PATENT OWNER'S EXHIBIT LIST

Exhibit	Description
2001	Amended Complaint for Patent Infringement, <i>Centripetal Networks, Inc. v. Keysight Techs, Inc., and Ixia</i> , No. 2:17-cv-00383, Dkt. No. 192 (E.D. Va. June 13, 2018)
2002	Invalidity Chart for U.S. Patent No. 9,917,856, <i>Centripetal Networks, Inc. v. Keysight Techs., Inc., and Ixia</i> , No. 2:17-cv-00383 (E.D. Va.) – CENTRIPETAL-CSCO 172221 – 349
2003	Expert Report of Adam Sorini Regarding Invalidity (including Appendices), <i>Centripetal Networks, Inc. v. Keysight Techs., Inc., and Ixia</i> , No. 2:17-cv-00383 (E.D. Va. July 30, 2018) – CENTRIPETAL-CSCO 087501 – 88046
2004	Minutes of Proceedings, <i>Centripetal Networks, Inc. v. Keysight Techs, Inc., and Ixia</i> , No. 2:17-cv-00383, Dkt. No. 581 (E.D. Va. Oct. 9, 2018)
2005	Amended Complaint, <i>Centripetal Networks, Inc. v. Cisco Sys., Inc.</i> , No. 2:18-cv-00094, Dkt. No. 29 (E.D. Va. Mar. 29, 2018)
2006	Order, <i>Centripetal Networks, Inc. v. Cisco Sys., Inc.</i> , No. 2:18-cv-00094, Dkt. No. 68 (E.D. Va. Sept. 18, 2019)
2007	Declaration of Hannah Lee in Support of Patent Owner's Opposition to Petitioner's Motion for Joinder
2008	Defendants Identification of Prior Art, <i>Centripetal Networks, Inc. v. Keysight Techs, Inc., and Ixia</i> , No. 2:17-cv-00383 (E.D. Va. July 5, 2018)
2009	Demonstrative Exhibit DDX2 - Adam Sorini Direct Examination, <i>Centripetal Networks, Inc. v. Keysight Techs, Inc., and Ixia</i> , No. 2:17-cv-00383 (E.D. Va.)
2010	Email from S. McKeown to J. Hannah re Precedential Opinion Panel Review for IPR2022-00182, dated, June 30, 2022

Patent Owner's Opposition to Motion for Joinder
IPR2022-01151 (U.S. Patent No. 9,917,856)

Exhibit	Description
2011	Statement of Jonathan Rogers (COO, Centripetal Networks, Inc.) Before the Subcommittee on Courts, Intellectual Property, and the Internet - Committee on the Judiciary United States House of Representatives (June 23, 2022) https://www.congress.gov/117/meeting/house/114937/witnesses/HHRG-117-JU03-Wstate-RogersJ-20220623.pdf

I. INTRODUCTION

Cisco's and Keysight's joinder petitions illustrate why Palo Alto Networks' (PAN) petition challenging the '856 Patent never should have been granted. Cisco's and Keysight's petitions—filed long after the applicable one-year bar dates—are just the latest examples of a pattern of harassment Centripetal has faced since debuting its revolutionary technology in the early 2010s. Cisco seeks to join a proceeding that asserts the same art it, and '856 Patent-licensee Keysight, passed over in their own unsuccessful bids to invalidate the '856 Patent. While Cisco's argues that joinder is in the “public interest” (Paper 3 (“Mot.”) at 10), Cisco's interest is entirely personal: it seeks to avoid billions in liability while crushing a nascent competitor through predatory infringement.

Denial of joinder in this instance is particularly warranted because Petitioner, as a time-barred party, fails to provide any cogent reason for the extreme delay in filing the Petition or why fairness dictates it should otherwise be allowed to join the PAN IPR. Moreover, Petitioner raises impermissible new issues of secondary considerations not found in PAN's petition, increasing cost, complexity, and prejudice to Centripetal. To stop this clear attempt to game the system with an end-run around the time-bar and abusive serial attacks on validity across forums, this motion for joinder must be denied.

II. STATEMENT OF THE CASE

Centripetal first served Keysight with a complaint for infringing the '856 Patent on June 13, 2018. *See* Ex. 2001 at 82. Just weeks later, Keysight elected Buruganahalli as one of its 24 prior art references and then served invalidity contentions, mapping disclosures from Buruganahalli against the claims of the '856 Patent, including the claims challenged here. Ex. 2002; Ex. 2008. Keysight's expert also considered Buruganahalli in his subsequent expert report. Ex. 2003 at 9. Yet, in tacit recognition of the significant flaws with Buruganahalli (*see* Section IV.C.2, *infra*), Keysight and its expert dropped Buruganahalli entirely and proceeded to trial with other art. Ex. 2003 at 3, 284-351; Ex. 2009 at 248-81. After 4 days of trial, Keysight settled its dispute with Centripetal, opting to take a license to the '856 Patent. Ex. 2004. After Cisco brazenly copied Centripetal's patented technology following private disclosure meetings with Centripetal (Ex. 1027 at 150-151), Centripetal was forced to initiate an action to enforce its patents, including the '856 Patent. Ex. 2005 (complaint dated Mar. 29, 2018) at 8, 184). That action was stayed for over six months while the Board considered Cisco's fourteen separate IPR petitions—none of which challenged the '856 Patent—as Cisco attempted to invalidate the '856 Patent in district court. Ex. 2006.

Before trial, Cisco was well aware of Buruganahalli and its shortcomings. Shortly after the stay was lifted, Centripetal produced Keysight's invalidity contentions and expert reports to Cisco. Ex. 2007. Like Keysight, Cisco passed

Patent Owner's Opposition to Motion for Joinder
IPR2022-01151 (U.S. Patent No. 9,917,856)

over Buruganahalli (and the chance to file *any* IPR), opting to pursue its self-characterized “best” system-based prior art (Paper 1 (“Pet.”) at 25) through trial. Ex. 1027 at 57-67. After an extensive trial, the ’856 Patent was found both not invalid and willfully infringed by Cisco. Ex. 1027 at 166. Although this judgment was recently vacated because the judge’s wife did not divest a nominal amount of Cisco stock (after a “full draft of [his] opinion [on the bench trial] had been prepared” and “[v]irtually every issue was decided”), Cisco did not challenge the judge’s validity determination on appeal. *Centripetal Networks, Inc., v. Cisco Sys., Inc.*, No. 2021-1888, 2022 WL 2252638, at *1, *12 (Fed. Cir. June 23, 2022).

While the Cisco judgment was on appeal, PAN filed a raft of IPR and PGR petitions, including 14 petitions challenging patents that Centripetal asserted against PAN and, in a clear play for leverage, 3 petitions challenging unasserted patents underlying the Cisco judgment, including the ’856 Patent. The Board instituted that proceeding over Centripetal’s strenuous objection. IPR2022-00182, Paper 6 (“’182 POPR”). Centripetal’s pending Rehearing Request, which explains why allowing IPR petitions challenging unasserted patents underlying pending judgments opens the floodgates to abuse, remains pending. IPR2022-00182, Paper 13, (“’182 R’hrq Req.”). Meanwhile, Cisco and Keysight, two time-barred parties that both intentionally declined to challenge the ’856 Patent via IPR or in any forum based on known prior art (Buruganahalli), seek to exploit that abusive

proceeding to take a second bite at the apple. The Motion for Joinder must be denied to avoid this abuse.

III. THE BOARD MUST DENY JOINDER BECAUSE THE PETITION RAISES NEW ISSUES

Cisco promises its joinder adds little complication, cost, or prejudice and raises no new grounds. Mot. at 10-14. Yet, in the same breath, Cisco's Petition openly admits that the Petition "preemptively" raises new issues regarding objective indicia of nonobviousness, in a clear attempt to fix PAN's faulty petition. Mot. at 7 & n.2. Cisco's Motion for Joinder must be denied under controlling precedent. *See Facebook, Inc., v. Windy City Innovations, LLC*, 973 F.3d 1321, 1333 (Fed. Cir. 2020) ("§ 315(c) ... does not authorize the joinder of new issues.").

In the '182 POPR, Centripetal pointed out PAN's failure to address known and published findings and evidence of objective indicia of nonobviousness from the Cisco judgment itself provided sufficient grounds for the Board to deny institution. '182 POPR at 53. PAN's failure to address this evidence is still pending in Centripetal's Rehearing Request. By attempting to shore up PAN's petition, Cisco has presented a new issue that improperly responds to Centripetal's POPR and the Board's institution decision in the PAN IPR. Pet. at 67-75; *Windy City*, 973 F.3d at 1333; PTAB Consol. Trial Practice Guide (Nov. 2019) ("CTPG") at 76-77; *see In re Leithem*, 661 F.3d 1316, 1319-20 (Fed. Cir. 2011) (new ground does not require new prior art, but can be based on "new facts and rationales not

Patent Owner's Opposition to Motion for Joinder
IPR2022-01151 (U.S. Patent No. 9,917,856)
previously raised"); *In re NuVasive, Inc.*, 841 F.3d 966, 971-72 (Fed. Cir. 2016)
(similar).

IV. THE BOARD SHOULD EXERCISE ITS DISCRETION TO DENY THE JOINDER MOTION

Although Petitioner's Motion for Joinder addresses the *Kyocera* factors, it effectively ignores the USPTO's and Federal Circuit's guidance on joinder motions as it has evolved since *Kyocera* was decided almost a decade ago. As *Kyocera*, the CTPG, *Apple Inc. v. Uniloc 2017 LLC*, IPR2020-00854, Paper 9 at 4 (P.T.A.B. Oct. 28, 2020) ("*Apple*"), and *Proppant Express Invs. v. Oren Techs.*, IPR2018-00914, Paper 38 at 19 (P.T.A.B. Mar. 13, 2019) ("*Proppant Express Invs.*") (precedential), each makes plain, joinder is not appropriate where joinder will add to the complexity of the proceeding, allows otherwise time-barred party harass the patent owner, and/or the Board's discretionary denial factors independently weigh in favor of denying the petition. Centripetal respectfully requests that the Board deny the Motion for these reasons and those that follow.

A. The Board Should Deny Joinder to Curtail Ongoing Harassment

Centripetal warned of the harm of allowing Petitioners to challenge unasserted patents underlying significant verdicts in the time between judgment and satisfaction of the judgment. '182 POPR at 34-39; '182 R'hrq Req. at 3-8. That harm has now come to pass. The institution of the PAN IPR has "encourage[d] additional improper petitions" and has given a "willful and

egregious” infringer a second bite at the apple. ’182 POPR at 35; *see* ’182 R’hrq Req. at 4-5. That a Petition filed by a party with no stake in the challenged claims has enabled and encouraged further harassment and abuse by time-barred parties reinforces the need for the USPTO to police harassment at institution. Joinder in the face of harassment and prejudice is inappropriate and highly prejudicial. CTPG at 77; *Proppant Express Invs.* at 19.

As Centripetal previously explained, PAN “has no reasonable basis to maintain this challenge other than harassment, . . . has no stake in the outcome,” and “seeks to leverage this IPR against Patent Owner in unrelated litigation because the ’856 Patent underlies a significant damages award based on Cisco’s massive and willful infringement.”¹ ’182 POPR at 35; ’182 R’hrq Req. at 4-5. As in *OpenSky*, currently under Director’s review, the USPTO’s failure to stem harassment at institution “encourage[s] bad actors to harass patent owners by filing IPRs any time a meaningful judgment is entered against third-party defendants, in

¹ Contrary to PAN’s attempts to manufacture an infringement allegation (Ex. 2010), the ’856 Patent is not directly related to any asserted patent, and neither Centripetal nor its expert ever accused PAN of infringing the ’856 Patent. Ex. 1103 at 1626:20-24 (“I refer you to my report where . . . [PAN’s] products are identified. None have been accused of infringement.”).

hopes of extracting some form of advantage (monetary or otherwise).” ’182 POPR at 37; ’182 R’hrq Req. at 4-5.

In fact, this case is even more problematic than *OpenSky* because multiple industry giants have now teamed up to crush a disruptive startup after one party licensed the patent and another “willful[ly] and egregious[ly]” ripped off Centripetal’s technology. Ex. 1027 at 166. This anticompetitive institution decision places a bounty on every patent judgment and promises to tie up infringed patents in administrative proceedings after those patents have proved valuable in Article III courts. Congress could hardly have envisioned that the USPTO would be employed as a “de facto appellate body to check district court judgements” when it passed the AIA, and instituting trial under these circumstances undermines “integrity of the patent system.” ’182 R’hrq Req. at 9; 35 U.S.C. § 316(b).

Allowing these abusive tactics also thwarts Congress’ admonishment that “[IPRs] are not to be used as tools for harassment or a means to prevent market entry through repeated litigation and administrative attacks on the validity of a patent,” thereby frustrating the purpose of IPRs “as providing quick and cost effective alternatives to litigation.” H.R. Rep. No. 112-98, at 78 (2011). As Centripetal’s COO, Jonathan Rogers, recently testified to Congress: “[i]t is not justice if David has to slay Goliath over and over again.” Ex. 2011 at 5. Here, “even though the district court and the USPTO already determined that the four

Centripetal patents that Cisco was found to infringe were not invalid, multiple challenges have been filed against these patents after the judgment even though they are not asserted against any other company.” *Id.* This serial harassment and delay is antithetical to the goals of the AIA. To curb this abuse, Petitioner’s joinder motion must be denied.

B. The Board Should Deny Joinder Because Cisco is Otherwise Time Barred and Faces no Undue Prejudice

In addition to ignoring the CTPG’s admonition the Board should “carefully balance the interest in preventing harassment against fairness and prejudice concerns,” Petitioner ignores that “the existence of a time bar under 35 U.S.C. § 315(b) is one of several factors that may be considered when exercising discretion under 35 U.S.C. § 315(c).” CTPG at 76 (citation omitted). Petitioner is indisputably time-barred under 35 U.S.C. § 315(b) from filing an IPR petition against the ’856 Patent. Exs. 2001, 2005.

The one-year time bar exists to “ensure ‘quiet title to patent owners’ and to prevent *inter partes* review from being ‘used as [a] tool[] for harassment.’” *Proppant Express Invs.* at 18 (citing H.R. Rep. No. 112-98, at 48 (2011)). Joinder of a time-barred party is thus only permitted “in extremely limited circumstances” in a “narrow exercise of discretion” to prevent “harassment” and “attempts to game the system.” CTPG at 77. Beyond merely addressing the *Kyocera* factors (Mot. at 7-14; CTPG at 76), a time-barred Petitioner must also provide a “sufficient

justification” for its delay. *See Code200 v. Bright Data, Ltd.*, IPR2021-01503, Paper 13 at 8-9 (P.T.A.B. Mar. 14, 2022) (denying joinder); *HTC Corp. v. Ancora Techs.*, IPR2021-00570, Paper 17 at 12-13 (P.T.A.B. Jun. 10, 2021) (4-year delay weighed towards denial). Despite its time-barred status, Petitioner fails to provide any explanation for its delay or why fairness justifies the extreme prejudice of forcing Centripetal to relitigate validity. CTPG 56-57, 76-77. Nor could it.

Cisco was served with a complaint alleging infringement of the '856 Patent roughly 4 years ago. Ex. 2005. As Cisco readily admits, it actively forum shopped, choosing to present its “best” art (Pet. at 25)—its system art—against the '856 Patent in the district court instead of a printed publication and patent challenge in the IPR. Pet. at 25; Mot. at 8; Ex. 1027 at 57. And Cisco chose that system of art despite being aware of Buruganahalli by November 2019, when Centripetal produced Keysight's Invalidity Contentions and expert reports. Ex. 2007. Despite presenting its “best” case in the forum of its choosing, Cisco abandoned its challenge to the district court's validity determination (Ex. 1027) in its post-trial filings and later, its appeal. “Omissions of a petitioner,” like its failure to file an IPR or raise Buruganahalli in district court, do not implicate “fairness and prejudice concerns” that might justify the granting of Petitioner's Motion. CTPG at 77.

Furthermore, as the Board recognized in *Apple*, if a time-barred party is allowed to join, and the Petitioner in the original party were to settle, the time-barred party “would stand in as a petitioner in the joined proceeding and that the Board would expend resources in continuing the proceeding” that “would otherwise be terminated.” *Apple* at 12. This is the same case for Petitioner here. Allowing Petitioner “to continue a proceeding, even after settlement with the primary petitioner, based on a second attempt by [Petitioner],” “weighs in favor of denying institution of the proceeding.” *Id.*

Petitioner has provided no explanation for its multi-year delay in reopening its validity attack after passing up the opportunity to file an IPR and after having a full and fair opportunity to challenge the '856 Patent's validity in district court. CTPG at 77. Granting joinder in these circumstances is highly prejudicial to Centripetal, forcing it to relitigate validity against Petitioner again in yet another forum. Permitting Petitioner to join this case now would thwart the AIA's goal to provide a less expensive alternative to district court litigation on fully litigated and/or long-abandoned issues.

C. The Board Should Deny Joinder Under *Fintiv*

The Board should also deny this Petition under *Fintiv*. See *Apple* at 4 (denying joinder in view of discretionary denial factors).

1. Investment in Prior Proceedings Weighs in Favor of Denial

Fintiv Factors 1-3 weigh strongly in favor of the Board denying this Petition because Centripetal and Cisco already completed a 22-day bench trial on validity and Cisco has abandoned any further challenge to validity. *See, e.g., Apple Inc. v. Unwired Planet Int'l Ltd.*, IPR2020-00642, Paper 15 at 6-7 (P.T.A.B. Sept. 9, 2020) (prior trial “strongly favors” denial); *Amazon.com, Inc. v. Vocalife LLC*, IPR2020-00864, Paper 22 at 9-11 (P.T.A.B. Oct. 28, 2020) (same). The district court, Cisco, and Patent Owner have already invested enormous resources in resolving Cisco’s “best” (Pet. at 25) contention that Cisco’s Stealthwatch product invalidates the ’856 Patent. Cisco lost.

While Cisco notes that this judgment was recently vacated, that decision was unrelated to the merits, and Cisco did not challenge or appealed the judge’s validity determinations. Ex. 1027 at 59-67; *see also* Ex. 1028 at 20. Moreover, Cisco is well past the point where it could possibly inject new invalidity grounds in the remanded proceedings, rendering its *Sotera* stipulation illusory. Because a trial has already concluded, and Cisco had every opportunity to raise Buruganahalli, in addition to any other reference that “reasonably could have been raised” in an IPR, this case remains squarely within the *Fintiv* framework after the Director’s Interim Procedure for Discretionary Denials. *Fintiv* Factors 1-3 therefore weigh strongly in favor of the Board exercising its discretion to deny institution of Cisco’s joinder motion.

2. The Issues Overlap Heavily with the Prior Proceedings, and the Petitioner Meritless (*Fintiv* Factors 4 and 6)

The overlap of issues and the overall weakness of the merits (*Fintiv* Factors 4 and 6) also warrant denial in this case. *Fintiv*, at 12-13. The core issue of whether filtering packets comprising encrypted data using packet-filtering rules would have been obvious was fully considered in the prior litigation. Ex. 1027 at 59-67. The district court resolved that issue with a resounding no. *Id.*

Buruganahalli shares the same deficiencies as Cisco's Stealthwatch product. Like the old Stealthwatch product, Buruganahalli does not teach or suggest applying packet-filtering rules to encrypted packets. '182 POPR at 15 (quoting Ex. 1027 at 61), 49-50; Ex. 1027 at 61. PAN's petition—like Petitioner's petition—"equates Buruganahalli's firewall policies/rules, including the blacklist policy to the claimed 'plurality of packet-filtering rules.'" '182 POPR at 47; Pet. at 45-47. These policies, however, are *only* applied to encrypted traffic after the traffic has been decrypted. '182 POPR at 47-50 (citing Ex. 1004, Buruganahalli at 4:16-22 ("decrypting such secure communications are needed ... to apply filtering based on a policy"), 6:17-22 (requiring "that the session be decrypted for ... potential filtering based on the policy"), 11:2-6 (firewall policy/rule violations cannot be detected without decryption), 12:29-32, 14:8-15:3, Fig. 6).

In instituting trial in IPR2022-00182, the panel preliminarily determined that Buruganahalli "teaches 'filtering encrypted packets' as required by the '856

patent's claims," as Cisco recognizes. Pet. at 22-23 (citing IPR2022-000182, Paper 11, (" '182 ID") at 21-22, 26); *see* '182 ID at 69-71. These issues will be more fully addressed in the preliminary response, but two errors in the PAN IPR panel's decision warrant discussing. **First**, the PAN IPR panel relied on Buruganahalli's "flow lookup" with encrypted communications. '182 ID at 69. This flow lookup determines which flow the packet belongs to based on the "IP address and port number," *not* with reference to any alleged "packet-filtering rules." Ex. 1004 at 9:25-32, 14:21-28; '182 POPR at 49-52. Before any of Buruganahalli's alleged "packet-filtering rules" are applied to encrypted traffic, those encrypted packets *must* be decrypted. Ex. 1004 at 4:16-22, 6:17-22, 7:60-67, 11:2-6, 12:29-32, 14:8-15:3, Fig. 6.

Second, the panel relied on Buruganahalli's description of Figure 3 applying firewall policies/rules without "having to decrypt" encrypted communications. '182 ID at 70-71. But the encrypted communications do not need to be decrypted because the flow is blocked after inspecting an unencrypted handshake packet, before the encrypted session is established, and before any encrypted packets are even received. '182 POPR at 52 (citing Ex. 1004 at 5:62-6:1); Ex. 1004 at 11:17-19 ("**prior to** and/or without having to decrypt **the encrypted secure tunnel session traffic.**") (emphasis added).

As discussed in the pending Rehearing Request, these aspects of Buruganahalli (and Centripetal's arguments regarding the same) were misapprehended or overlooked. *See* Reh'g, Req. at 10-14. This is not, therefore, a case where the "petition presents compelling evidence of unpatentability." Vidal, K., Interim Proc. for Discretionary Denials in AIA Postgrant Proceedings with Parallel District Ct. Litig. (U.S.P.T.O. June 21, 2022), at 2 (https://www.uspto.gov/sites/default/files/documents/interim_proc_discretionary_denials_aia_parallel_district_court_litigation_memo_20220621_.pdf). On the contrary, Buruganahalli shares the very deficiencies of Cisco's old Stealthwatch product, which was fully considered in the district court litigation between Centripetal and Cisco. Accordingly, *Fintiv* Factors 4 and 6 weigh strongly in favor of denial.

3. The Parties and Claims Overlap with the Prior Proceedings (*Fintiv* 5)

Fintiv Factor 5 weighs in favor of denying the Petition because Cisco and Centripetal were both parties to the prior litigation.

D. Other Discretionary Denial Factors Weigh in Favor of Denying Joinder (*Fintiv* Factor 6)

Under *Fintiv* Factor 6, the Board considers any other factors that weigh in favor of denying a petition. Here, the vast majority of the *General Plastic* factors also support the Board exercising its discretion to deny the joinder petition.

1. Cisco's Prior Knowledge of the Prior Art, the Unexplained Lapse of Time Before Filing, and Receipt of the POPR and Institution Decision Weigh in Favor of Denial (*General Plastic* 2-5)

General Plastic Factors 2-5 address knowledge of the prior art, unexplained delays in filing, and tailoring. CTPG at 57; *Apple* at 9-11 (lack of explanation of factors weigh in favor of denial). All four factors weigh in favor of denying institution. Cisco could have, but chose not to, challenge validity based on Buruganahalli during the prior trial. See Sections II, V, *supra*. Almost three years have elapsed since Cisco learned of Buruganahalli, and Cisco has not provided any explanation for its delay. See Section IV, *supra*. Cisco indisputably received and reviewed both the POPR and Institution Decision in the PAN IPR, waiting until after institution to join and then tailoring its own petition with new evidence and issues of secondary considerations. See Section V, *supra*. *General Plastic* Factors 2-5 all weigh strongly in favor of denial.

2. The Finite Resources of the Board Weigh in Favor of Denial (*General Plastic* 6)

As discussed above, allowing Cisco “to continue a proceeding, even after settlement with the primary petitioner, based on a second attempt by [Cisco],” “weighs in favor of denying institution of the proceeding.” *Apple* at 12.

V. CONCLUSION

For the foregoing reasons, Centripetal respectfully requests that the Board deny Petitioner's Motion for Joinder.

Patent Owner's Opposition to Motion for Joinder
IPR2022-01151 (U.S. Patent No. 9,917,856)

Respectfully submitted,

Dated: July 22, 2022

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(Case IPR2022-01151)

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CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. 42.6(e), that service was made on Petitioner as detailed below.

<i>Date of service</i>	July 22, 2022
<i>Manner of service</i>	Electronic Mail
<i>Documents served</i>	PATENT OWNER'S OPPOSITION TO PETITIONER'S MOTION FOR JOINDER
<i>Persons served</i>	HAYNES AND BOONE, LLP Theodore M. Foster David L. McCombs Gregory P. Huh ipr.theo.foster@haynesboone.com david.mccombs.ipr@haynesboone.com gregory.huh.ipr@haynesboone.com

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