

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETSKOPE, INC.,

Petitioner,

v.

K.MIZRA LLC,

Patent Owner.

PTAB Case No. IPR2025-01115

Patent No. 8,234,705 B1

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

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	PO’S ACTIONS BY NOT ALLOWING PTAB TO CORRECT ITS ERRORS SIGNIFICANTLY ERODES PO’S SETTLED EXPECTATIONS.....	3
III.	PTAB IS BEST SUITED TO DETERMINE ’705 PATENT’S VALIDITY	4
	A. The Petition is Narrowly Crafted to Enhance Judicial Economy	4
	B. Petitioner’s <i>Sotera</i> Stipulation Prevents Potential Duplicative Invalidity Determinations of the ’705 Patent.....	6
	C. The Complex Technical Nature of the ’705 Patent Makes PTAB the Most Suitable Forum to Resolve Invalidity	7
IV.	PETITIONER’S PROMPT ACTIONS IN CHALLENGING THE ’705 PATENT WEIGH AGAINST DISCRETIONARY DENIAL	9
V.	TO THE EXTENT <i>FINTIV</i> DOES APPLY INSTITUTION IS STILL FAVORED	10
	A. <i>Fintiv</i> Factors Favor Petitioner.....	11
	1. <i>Fintiv</i> Factors Overwhelmingly Favor Petitioner When Considering <i>Netskope v. K.Mizra</i> Litigation	12
	2. <i>Fintiv</i> Factors Also Favor Petitioner When Considering Google and Citrix Litigations	12
VI.	THE MERITS OF THE PETITION ARE COMPELLING.....	15
VII.	CONCLUSION.....	15

EXHIBIT LIST

Ex.1001	U.S. 8,234,705
Ex.1002	Prosecution History of U.S. 8,234,705
Ex.1003	Declaration of A.L. Narasimha Reddy, Ph.D., Under 37 C.F.R. § 1.68 in Support of Petition for <i>Inter Partes</i> Review
Ex.1004	<i>Curriculum Vitae</i> of Narasimha Reddy, Ph.D.
Ex.1005	U.S. Patent No. 9,436,820 to Gleichauf et al.
Ex.1006	U.S. Patent No. 7,747,862 to Ovadia
Ex.1007	U.S. Patent No. 7,533,407 to Lewis et al.
Ex.1008	U.S. Patent No. 7,568,107 to Rathi et al.
Ex.1009	U.S. Patent Pub. No. 2004/0177276 to MacKinnon et al.
Ex.1010	U.S. Patent Pub. No. 2006/0005009 to Ball et al.
Ex.1011	U.S. Patent No. 6,829,654 to Jungck
Ex.1012	TCG Specification Architecture Overview (Rev. 1.2 Apr. 28, 2004), <i>available at:</i> https://web.archive.org/web/20061003162035if_/https://www.trustedcomputinggroup.org/groups/TCG_1_0_Architecture_Overview.pdf
Ex.1013	TPM Main – Part 1 Design Principles, Specification Version 1.2 (Rev. 62 Oct. 2, 2003), <i>available at:</i> https://trustedcomputinggroup.org/wp-content/uploads/tpmwg-mainrev62_Part1_Design_Principles.pdf
Ex.1014	U.S. Patent Pub. No. 2003/0061494 to Girard et al.
Ex.1015	U.S. Patent Pub. No. 2005/0078668 to Wittenberg et al.

Ex.1016	U.S. Patent No. 7,571,460 to Danforth et al.
Ex.1017	U.S. Patent Pub. No. 2005/0097199 to Woodard et al.
Ex.1018	TCPA Main Specification (Version 1.1b, 2003), available at: https://trustedcomputinggroup.org/wp-content/uploads/TCPA_Main_TCG_Architecture_v1_1b.pdf
Ex.1019	Plaintiff's Preliminary Infringement Contentions, <i>K.Mizra LLC v. Cisco Systems, Inc.</i> , No. 6-20-cv-01031 (W.D. Tex. Feb. 5, 2021) (without exhibits).
Ex.1020	RESERVED
Ex.1021	U.S. Patent Pub. No. 2005/0033987 to Yan et al.
Ex.1022	RESERVED
Ex.1023	U.S. Patent No. 7,330,977 to Cromer et al.
Ex.1024	IPR2021-00593, Final Written Decision
Ex.1025	Federal Circuit Affirmance Statistics for PTAB Decisions
Ex.1026	NDCA Time to Trial Statistics
Ex.1027	WDTX Time to Trial Statistics
Ex.1028	<i>K.Mizra v. Citrix</i> Scheduling Order
Ex.1029	SDFL Time to Trial Statistics
Ex.1030	K.Mizra's Pattern of Litigation Settlements – Docket Navigator
Ex.1031	<i>K.Mizra v. Google</i> Claim Construction Order
Ex.1032	<i>K.Mizra v. Hewlett Packard</i> Claim Construction Order

I. INTRODUCTION

Netskope, Inc. (“Petitioner” or “Netskope”) respectfully submits that there are compelling reasons for the Office to institute this IPR for the U.S. Patent No. 8,234,705 (“the ’705 Patent,” Ex.1001), and none of reasons for discretionary denial K.Mizra LLC (“PO” or “K.Mizra”) identifies in its request (“DD Request”) suggest otherwise.

First, PO has no settled expectations because the ’705 patent’s validity hangs on a thread, as it has been the subject of a prior IPR, i.e., IPR2021-00593 with Cisco Systems as petitioner (“Cisco IPR”). The Cisco IPR was instituted, and the ’705 patent was found not unpatentable in a final written decision, only for the decision to be vacated and remanded back to the PTAB because of the Board’s “legal error and a fact finding un-supported by substantial evidence.” Paper 2, 3-4, citing IPR2021-00593, Paper 44, 13. PO then, instead of allowing the PTAB to re-evaluate its erroneous decision, decided to settle the case and terminate the proceeding in January 2025. Paper 2, 4; IPR2021-00593, Papers 50, 51. By not allowing the PTAB to determine whether the ’705 patent is valid or not, PO has forfeited its settled expectations of quiet title. This Petition is a remedial measure, filed only months after the termination of the Cisco IPR, to ask the PTAB to finish what it had started and to make a final determination as to the validity of the ’705 patent.

Second, Netskope’s Petition has been specifically tailored to save judicial resources by only including one invalidity ground based on the same three-reference combination and the same claim construction analysis as in the Cisco IPR. Therefore, the burden on the PTAB is not very high given the fully developed record from the Cisco IPR related to invalidity grounds, the teachings of prior art and claim construction issues. In fact, Petitioner has intentionally selected this route by not including additional invalidity grounds or other prior art references, despite the estoppel effects imposed on Petitioner if the IPR is instituted, only to ease the PTAB’s burden. Furthermore, given the already-existing PTAB record and the complex technical subject matter of the ’705 patent—computer network protection involving trusted platform modules, communication with quarantine server and DNS queries—Petitioner believes PTAB is best suited to address the validity of the challenged claims.

Third, Petitioner has acted early and pre-emptively by asking the PTAB to resume its assessment of the ’705 patent’s validity. Notably, the ’705 patent has not been asserted against Petitioner in a litigation, Petitioner is not, and has not been, a party to any other IPRs involving the ’705 patent, and the only district court action between the parties is a declaratory judgement for non-infringement filed by Petitioner in June 2025. By quickly filing this Petition only months after learning about the premature termination of the Cisco IPR, and before any infringement

filings by PO, Petitioner has complied with the Office's preference for early challenges.

Finally, PO has made numerous unsubstantiated and incorrect statements about the Petition and discretionary issues which are debunked below.

For these reasons, and more, Petitioner is respectfully requesting the Director to deny PO's request for discretionary denial and institute trial in this proceeding.

II. PO'S ACTIONS BY NOT ALLOWING PTAB TO CORRECT ITS ERRORS SIGNIFICANTLY ERODES PO'S SETTLED EXPECTATIONS

Although the '705 patent was issued in 2012, its validity has been in serious doubt, given PTAB's unfinished business of re-evaluating its erroneous final written decision in the Cisco IPR. As the Petition explains, in the Cisco IPR, the Federal Circuit on appeal "vacate[d] the Board's motivation to combine analysis, which was rooted in legal error and a fact finding un-supported by substantial evidence. ... [and] further vacate[d] the Board's ultimate determination that Cisco failed to show the unpatentability of the challenged claims of the '705 patent and remand[ed] for the Board to consider the remaining issues regarding the obviousness of the challenged claims, including Cisco's non-benefits-based motivation to combine arguments and Cisco's fourth rationale." Paper 2, 4, citing IPR2021-00593, Paper 44, 13.

When the Federal Circuit vacated and remanded the Cisco IPR, PO had the perfect opportunity to allow the Board to, once-and-for-all, inform past, present and

future licensees of the '705 patent, the infringers or potential infringers of the patent, and the interested public, whether the claims of the '705 patent are valid. Given the extensive record which had already been developed by the PTAB and the limited scope of the remand, such a final determination would have been made quickly, with little judicial resources, and likely permanently.¹ Yet, instead of opting for quiet certainty, PO decided to ask the Board to prematurely terminate the proceeding, thus creating uncertainty, which has led to subsequent litigations and IPR filings to defend against current and future assertions of the '705 patent. Petitioner respectfully submits that PO has forfeited its settled expectations by creating this aura of uncertainty on its own, forcing Petitioner, Netskope, to file this IPR requesting the Board to carry out its unfinished business.

III. PTAB IS BEST SUITED TO DETERMINE '705 PATENT'S VALIDITY

A. The Petition is Narrowly Crafted to Enhance Judicial Economy

PO casts blame on Petitioner for submitting an IPR petition that includes the same invalidity ground based on the combination of Gleichauf, Ovadia and Lewis used in the Cisco IPR. DD Request, 7-8. PO's assertions are misplaced. Petitioner

¹ Although, the final written decision would have been appealable, relevant statistics show that the Federal Circuit's affirmance rate of final written decisions was about 84% in 2024 (Ex. 1025) and would likely be even higher for cases after a remand.

has intentionally prepared the Petition to rely on the same three-reference combination as the Cisco IPR, using the same claim construction analysis and a substantially similar expert declaration to avoid unnecessary examination of additional references or invalidity grounds by the PTAB. Petitioner also provides certain additional comments about what had transpired in the Cisco IPR, claim constructions in related matters,² and explanations to enhance and clarify the invalidity ground. *See, e.g.,* Paper 2, 3-4, 11-12, 18-19, 25-27, 28-31. Notwithstanding the above, and as PO's Ex.2018 illustrates, the great majority of Netskope's Petition is substantially identical to Cisco's petition. *See* Ex.2018.

In providing a streamlined and narrowly drafted petition, the Board can rely on the already-existing record at the PTAB, along with Petitioner's additional explanations, to evaluate the errors in Cisco IPR's final written decision. This action by the Board does not require analysis of new prior art or re-assessment of claim

² A claim construction order for *K.Mizra v. Google* case was recently issued on October 28, 2025 (Ex. 1031), providing constructions consistent with those in this IPR and with prior constructions by the district courts and the PTAB. *See* Paper 2, 11-12; *see also* Ex. 1032.

construction issues, thus enabling an efficient assessment of the factual and legal issues.

Petitioner has chosen this course of action despite IPR estoppel ramifications, preventing Petitioner from challenging the '705 patent in other proceedings using any ground that Petitioner raised or reasonably could have raised in this IPR petition, if the IPR is instituted and a final written decision is issued. 35 U.S.C. § 315(e)(2). Notably, by limiting the IPR invalidity ground to the same three-reference combination used in the Cisco IPR, Petitioner, at the expense of being estopped, is sparing the Board from reviewing multitude of additional prior art references and invalidity grounds.

B. Petitioner's *Sotera* Stipulation Prevents Potential Duplicative Invalidity Determinations of the '705 Patent

To even go a step further, Petitioner filed a *Sotera* stipulation, stating that it will not pursue in the parallel district court proceeding “the specific grounds raised or could have been reasonably raised in IPR2025-01115.” Paper 6. This stipulation was filed despite Petitioner not even being required to provide a stipulation because the parallel district court litigation, *Netskope, Inc. v. K.Mizra LLC*, No. 3:25-cv-04833 (N.D. Cal.), only involves a declaratory judgment (“DJ”) of non-infringement and does not challenge the '705 patent's validity. Nonetheless, Petitioner opted to file a *Sotera* stipulation to alleviate PO's concerns even in the theoretical scenario where the district court action expands beyond non-infringement. Thus, Petitioner's

Sotera stipulation provides further assurances to the Board that there will not be duplicative adjudications.

PO now attempts to use Petitioner's *Sotera* stipulation to argue that the stipulation shows "that invalidity will be an issue in both actions." DD Request, 3. Such an argument is misplaced. Not only is there currently no invalidity action in the parallel district court proceeding, given the timeline of the district court DJ action, the final written decision for this IPR will issue close to a year before the district court's trial date,³ by which time either the '705 patent is rendered invalid, or an estoppel under 35 U.S.C. 315 has attached. Therefore, PO's assertions regarding Petitioner's *Sotera* stipulation do not make any sense.

C. The Complex Technical Nature of the '705 Patent Makes PTAB the Most Suitable Forum to Resolve Invalidity

The '705 patent is titled "Contagion Isolation and Inoculation" (Ex.1001, Title) and it includes 25 drawings and 19 columns of text related to techniques for isolating a computer network from security threats such as computer worms, viruses and

³ The final written decision in this IPR must be issued by February 21, 2027, whereas the trial date for the Netskope's declaratory judgment action has not even been set, but is likely to occur sometime in December 2027 to January 2028 based on trial statistics. Ex. 1026.

trojan horses. *Id.*, 3:7-45. The claims of the '705 patent recite methods and systems for protecting a network by detecting an insecure condition, contacting a trusted platform module to receive a response, determining whether the response includes a valid digitally signed attestation of cleanliness of cleanliness of a trusted computing base, and several additional steps requiring communications with a quarantine sever, and receiving a request comprising a DNS query, among other things. *Id.*, 19:55-20:20, 21:1-38, 22:14-49. Furthermore, the claims require construction of multiple technical terms, including a “*trusted computing module*,” which Petitioner proposes to be construed as “*a secure cryptoprocessor that implements the Trusted Platform Module specification from the Trusted Computing Group*,” based on PO’s own statements during the prosecution of the '705 patent. Paper 2, 8-10.

The three references used in the Petition, Gleichauf, Ovadia and Lewis, similarly relate to providing computer security and their combination requires augmenting the capabilities of Gleichauf’s system by those described in Ovadia and Lewis. Paper 2, 14-73. Only a cursory review of the '705 patent and Petition’s references reveals the high level of technical complexity of the subject matter of the challenged claims, making the PTAB a better forum for resolving those highly technical issues. To reiterate, the PTAB has already established an extensive record, including the analysis of the Petition’s references, claim construction issues and

expert's positions, making PTAB the most efficient forum for resolving the invalidity issues in this Petition.

IV. PETITIONER'S PROMPT ACTIONS IN CHALLENGING THE '705 PATENT WEIGH AGAINST DISCRETIONARY DENIAL

The Cisco IPR was prematurely terminated on January 30, 2025, due to K.Mizra's settlement of its dispute. IPR2021-00593, Paper 51. Petitioner filed this Petition promptly a few months later in August of 2025 to preemptively head off a potential infringement litigation by K.Mizra (Paper 2), although, to date, K.Mizra has not filed an infringement action against Netskope.⁴ Therefore, unlike other petitioners, Netskope has acted early without even being subject to a one-year time bar under 35. U.S.C. 315(b) that is the hallmark of most other IPR petitions. *See, e.g., Irhythm Technologies, Inc. v. Welch Allyn, Inc.*, IPR2025-00363, Paper 1, where the petitioner filed an IPR more than 10 months after being sued in district court, resulting in denial of the petition; *see also id.*, Paper 10.

PO improperly points to another IPR filed by a different petitioner, Citrix, to assert that similar invalidity arguments are being raised at the PTAB. DD Request, 6; Ex.2016. This issue is now moot in view of a recent motion by Citrix to withdraw its Petition and terminate the proceeding. IPR2025-01468, Paper 9. But regardless

⁴ As discussed earlier, Petitioner has filed a DJ action for non-infringement.

of Citrix's motion, Citrix filed its petition on August 29, 2025 (Ex.2016, 90-91), *after* the instant IPR Petition was filed by Netskope on August 13, 2025. Paper 2, 74. PO's assertion that Netskope should be penalized for a later filed IPR petition by another entity, is in fact irrelevant to this IPR filing and counter intuitive.

PO also points to a section of the America Invents Act Report to contend that "Congress was clear that 'harassment . . . through repeated litigation and administrative attacks' is improper because it 'frustrate[s] the purpose of the section as providing quick and cost-effective alternatives to litigation.'" DD Request, 3, citing Ex.2005, 38. Notwithstanding that Petitioner is challenging the validity of the '705 patent only at the PTAB (and not through repeated litigations and administrative attacks), the above sections reproduced by PO pertain to Congress' comments about the "*post-grant review process*." Ex.2005, 48. The '705 patent is a pre-AIA patent filed in 2005 (Ex.1001, front page) and is not even eligible for a PGR, thus undermining PO's arguments.

V. TO THE EXTENT *FINTIV* DOES APPLY INSTITUTION IS STILL FAVORED

PO's *Fintiv* analysis heavily relies on the schedule and trial dates of Google and Citrix litigations that do not involve Petitioner, Netskope. DD Request, 3-7. Notably, Netskope *is not a party* to the Google or Citrix cases and has no control over those litigations. The PTAB has relied on the absence of a petitioner from parallel litigation even where that petitioner had business relationships with named

defendants in the parallel litigation. *See, e.g., Google v. Mullen*, IPR2025-00124, Paper 8, 31–32. Here, Netskope has not been involved in Google and Citrix litigations in any way, and neither Google nor Citrix is a real party in interest in the instant Petition. These facts alone should significantly weaken any *Fintiv* considerations for Netskope’s Petition.

Nonetheless, as explained below, *Fintiv* factors favor Petitioner even in view of other litigations.

A. *Fintiv* Factors Favor Petitioner

As established in the precedential case of *Apple v. Fintiv*, the Board considers six factors when exercising its discretion to deny an inter partes review in view of a parallel proceeding. *Apple v. Fintiv*, IPR2020-00019, Paper 11 (PTAB Mar. 20, 2020) (precedential). Those factors are: (1) whether the district court granted a stay or evidence exists that one may be granted if a proceeding is instituted; (2) proximity of the court’s trial date to the Board’s projected statutory deadline for a final written decision; (3) investment in the parallel proceeding by the district court and the parties; (4) overlap between issues raised in the petition and in the parallel proceeding; (5) whether the petitioner and the defendant in the parallel proceeding are the same party; and (6) other circumstances that impact the Board’s exercise of discretion, including the merits. *Id.*

PO points to three parallel district court litigation that PO that are each discussed below.

1. *Fintiv* Factors Overwhelmingly Favor Petitioner When Considering *Netskope v. K.Mizra* Litigation

Netskope filed its declaratory judgment action for non-infringement on June 6, 2005, in the United States District Court, Northern District of California. Paper 2, 2. There is no trial date set, but the estimated date for the trial based on the district's time-to-trial statistics (approximately 30 to 31 months from filing) is roughly December 2027 to January 2028. Ex.1026. This time window is about 11 months after the February 21, 2027, final written decision date for the instant IPR. Given that Netskope's litigation only involves non-infringement issues, there is little overlap between the IPR and litigation proceedings to begin with. Therefore, *Fintiv* factors (2), (3), (4) and (6)⁵ strongly favor Petitioner, while factors (1) and (5) tilt in PO's direction.

2. *Fintiv* Factors Also Favor Petitioner When Considering Google and Citrix Litigations

Netskope is not a party to either of these litigations, which should strongly move the *Fintiv* needle in Petitioner's favor. The Google litigation was filed on

⁵ The strong merits of the Petition (discussed in Section VI), along with PO's actions upsetting its settled expectations favor Petitioner. *See* Section II.

February 18, 2025, in Western District of Texas. Paper 2, 1. While the Google trial is currently scheduled to start in November 2026 (Ex.2006, 4), based on median and average time-to-trial statistics (approximately 25 to 29 months for WDTX, Ex.1027) the trial is more likely to start in mid-March to mid-July of 2027, which is after the February 21, 2027 final written decision date for this IPR. The PTAB has previously considered such timing scenarios as neither favoring nor counseling against discretionary denial. *See, e.g., Volkswagen v. Longhorn Automotive*, IPR2025-01064, Paper 10, 2.

The Citrix litigation was filed on April 24, 2025, in Southern District of Florida. Paper 2, 2. The trial date was recently set and is currently scheduled to start on March 15, 2027 (Ex.1028, 1), which is also after the final written decision date of this IPR.⁶

Regarding overlap in issues, PO contends that Google's invalidity contentions rely on the same three references used in Netskope's Petition (DD Request, 6) but only submits a four-page, heavily redacted section of a much larger document. *See* Ex.2015. Notably, PO fails to mention that Google's invalidity contentions include

⁶ The average time-to-trial statistics in SDFL indicates an approximate trial date in April 2027, which is also after this IPR's final written decision date. Ex. 1029.

at least 30 references (based on counting the number of entries in the Table of Ex.2015) and fails to reproduce any claim charts or other specific details of Google's contentions. For example, there is no indication whether Google's invalidity contentions actually rely on the specific combination of Gleichauf, Ovadia, and Lewis to show obviousness (as in Netskope's Petition), given that Ex.2015 only includes a generalized statement that any of the 30-plus references alone or in combination with any other reference in that set may *show anticipation or obviousness* of the claims. DD Request, 6; Ex.2015, 4. PO's discretionary denial request similarly lacks on any specifics. DD Request, 6-7.

PO also points to the IPR filed by Citrix to contend that there is an overlap in issues. DD Request, 6. But as noted earlier, Citrix filed a motion to terminate its IPR proceeding and the Citrix IPR was filed after Petitioner filed this Petition, making its relevancy moot.

Therefore, *Fintiv* factors (2), (4), (5) and (6) favor Petitioner, factor (3) being neutral or favoring Petitioner, while factor (1) is in PO's favor.

An additional consideration favoring Petitioner stems from the significant likelihood for settlement of Google and Citrix cases. While Netskope lacks any specific knowledge or control over the actions of Google or Citrix in their respective litigations, given the track record of PO, it is reasonable to assume that both Google and Citrix cases will settle before reaching a final conclusion. Notably, public

records of patent litigations involving K.Mizra show that, of 25 cases filed, 18 have been terminated, and 7 remain active, yet none has proceeded to a final conclusion at trial. *See* Ex.1030. Therefore, this IPR, if instituted, will likely be the only remaining proceeding deciding the validity of the '705 patent. Accordingly, the Director should institute this IPR in the interest of justice and public benefit.

VI. THE MERITS OF THE PETITION ARE COMPELLING

The Petition's technical and legal strengths strongly favor institution. The PTAB has already instituted an IPR based on the same three-reference combination in the Cisco IPR, and but for the errors in the final written decision, the challenged claims of the '705 patent would have been declared obvious and invalid. Netskope's Petition reiterates the same invalidity positions based on the combination of Gleichauf, Ovadia, and Lewis, and provides certain additional clarifications that make these positions even more compelling. The strong technical and legal merits of the Petition, in combination with the already existing record at the PTAB, make a compelling case for institution that preserves judicial economy while ensuring just and timely resolution of validity issues for the '705 patent.

VII. CONCLUSION

Netskope's Petition, necessitated by PO's refusal to allow the PTAB to reach a final determination in early 2025, is a remedial measure to adjudicate the validity of the '705 patent in a fair, knowledgeable and unbiased forum. Having already

analyzed many of the obviousness and claim construction issues in the earlier Cisco IPR, the Board can efficiently conduct an obviousness assessment to clarify the status of the challenged claims, and to prevent future adjudications, in this or other forums, that are likely to continue due to PO's established pattern of unfinished litigations.

Therefore, Netskope respectfully requests the Director to institute this proceeding.

Dated: November 21, 2025

PERKINS COIE LLP
11452 El Camino Real, Suite 300
San Diego, CA 92130
Telephone: (858) 720-5700
Fax: (858) 720-5834

Respectfully submitted,

/Babak Tehranchi/

Lead Counsel
Thomas Millikan, Reg. No. 72,316

Back-up Counsel
Babak Tehranchi, Reg. No. 55,937
Andrew Klein, *Pro Hac Vice*
Hessam Gharaviram, *Pro Hac Vice*

Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that true copies of the foregoing
PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL and associated exhibits have been served on Patent
Owner at the following address:

Brian S. Boerman, Reg. No. 66,678 - bboerman@sheridanross.com
Wayne M. Helge, Reg. No. 56,905 - whelge@bdiplaw.com
Robert R. Brunelli, Reg. No. 39,617 - rbrunelli@sheridanross.com
James T. Wilson, Reg. No. 41,439 - jwilson@bdiplaw.com
KMizra-NetskopeIPRService@sheridanross.com
erobinson@bdiplaw.com

Dated: November 21, 2025

By: /Meghan Bright/
Meghan Bright
Paralegal