From:	Fuehrer, Erik
To:	Berger, Aron; Washburn, Ian; pamstutz@scottdoug.com; rearle@scottdoug.com; #Q-MSFT
Cc:	DLA-QOMPLX-Microsoft
Subject:	QOMPLX LLC v. Microsoft Corporation, No. 1:25-cv-01383-ADA
Date:	Thursday, January 15, 2026 9:36:28 AM
Attachments:	image001.png

Counsel,

Microsoft Corporation has filed IPR Petitions challenging claims in the following patents: 12,218,934 (IPR2026-00182), 11,539,663 (IPR2026-00183), and 12,231,426 (IPR2026-00184). In relation to those IPRs, Microsoft makes the following stipulations.

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IPR2026-00182

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 12,218,934 (IPR2026-00182), Defendant will not pursue in this litigation against the claims challenged in IPR2026-00182, (i) the specific grounds raised in IPR2026-00182, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00182, as reflected in the table summarizing the Statutory Grounds for Challenges on page 3 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference raised in IPR2026-00182 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

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IPR2026-00183

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 11,539,663 (IPR2026-00183), Defendant will not pursue in this litigation against the claims challenged in IPR2026-00183, (i) the specific ground raised in IPR2026-00183, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00183, as reflected in the table summarizing the Statutory Grounds for Challenges on page 3 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference

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raised in IPR2026-00183 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

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IPR2026-00184

If the PTAB institutes an IPR (and does not subsequently vacate institution) based on Defendant Microsoft's petition against U.S. Patent No. 12,231,426 (IPR2026-00184), Defendant will not pursue in this litigation against the claims challenged in IPR2026-00184, (i) the specific grounds raised in IPR2026-00184, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00184, as reflected in the table summarizing the Statutory Grounds for Challenges on page 3 of the Petition; for avoidance of doubt, Microsoft reserves the right to rely on any reference raised in IPR2026-00184 for purposes other than its teachings of specific claim elements, including to show the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

Regards,

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