

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

QOMPLX LLC,
Patent Owner.

IPR2026-00182
Patent 12,218,934

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b), Microsoft Corporation (“Petitioner”) hereby submits the following objections to the evidence submitted by Patent Owner with its Response filed on September 1, 2026 (Paper 25). Petitioner’s objections apply equally to Patent Owner’s reliance on this evidence in any subsequently filed documents in this proceeding.

Exhibit	Objections
EX2037 (Second Declaration of Sam Malek, Ph.D.)	FRE 401-403: Lack of relevance, confusion of the issues, and risk of unfair prejudice. Any probative value is substantially outweighed by the risk of misleading the Board. FRE 702/703: The declaration includes improper expert testimony that does not cite sufficient facts or data or apply reliable principles and methods. <i>E.g.</i> , ¶¶ 39–44 rely on exhibits that do not support the opinions offered at least because they appear to be dated outside any relevant time period and/or have not been established to date from a period relevant to any issue in dispute.
EX2039 (Søren K. Jensen et al., <i>Time Series Management Systems: A Survey</i> , 29 IEEE Transactions on Knowledge & Data Eng’g 2581 (2017))	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 401-403: Lack of relevance, confusion of the issues, and risk of unfair prejudice. Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i> , the exhibit

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	has not been established to date from a period relevant to any issue in dispute. FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.
EX2040 (Goetz Graefe, <i>Storage Manager</i>, in <i>Encyclopedia of Database Systems</i> 3736 (Ling Liu & M. Tamer Özsu eds., 2d ed. 2018))	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 401-403: Lack of relevance, confusion of the issues, and risk of unfair prejudice. Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit dates from a period not relevant to any issue in dispute. FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth. FRE 106: Lack of completeness at least because the exhibit appears to lack portions that may provide essential context.
EX2041 (Sofwan A. Lawal, <i>Database Engines: Overview: Considerations and Importance in Database Engineering</i> (July 25, 2023),	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 401-403: Lack of relevance, confusion of the issues, and risk of unfair prejudice. Any probative value is

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https://blog.sofwancoder.com/database-engines-overview (accessed Aug. 31, 2026))	substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit dates from a period not relevant to any issue in dispute. FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.
EX2042 (<i>Database Design in DBMS</i>, <i>GeeksforGeeks</i> (updated May 1, 2026) https://www.geeksforgeeks.org/dbms/database-design-in-dbms/ (accessed Aug. 31, 2026))	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 401-403: Lack of relevance, confusion of the issues, and risk of unfair prejudice. Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit dates from a period not relevant to any issue in dispute. FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.
EX2043 (Sean Rhea et al., <i>LittleTable: A Time-Series Database and Its Uses</i>, in <i>Proc. of the 2017 ACM Int’l Conf. on Mgmt. of Data</i> 125 (2017))	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 401-403: Lack of relevance, confusion of the issues, and risk of unfair prejudice. Any probative value is substantially outweighed by the risk of misleading the Board.

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	FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.

Respectfully submitted,

Dated: September 9, 2026

By: /Andrew M. Mason/

Andrew M. Mason, Reg. No. 64,034
andrew.mason@klarquist.com
KLARQUIST SPARKMAN, LLP
One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Tel: 503-595-5300
Fax: 503-595-5301

Counsel for Petitioner

**CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6(e)(4)**

The undersigned certifies that on September 9, 2026, **PETITIONER'S
OBJECTIONS TO PATENT OWNER'S EVIDENCE** was served on counsel
for Patent Owner via electronic mail as follows:

Kenneth Weatherwax
Parham Hendifar
Lowenstein & Weatherwax LLP
1016 Pico Boulevard
Santa Monica, CA 90405
Email: weatherwax@lowensteinweatherwax.com
hendifar@lowensteinweatherwax.com
Qomplx_IPRs@lowensteinweatherwax.com

By: /Andrew M. Mason/
Andrew M. Mason, Reg. No. 64,034
andrew.mason@klarquist.com
KLARQUIST SPARKMAN, LLP
One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Tel: 503-595-5300
Fax: 503-595-5301

Counsel for Petitioner