

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

QOMPLX LLC,
Patent Owner.

IPR2026-00184
Patent 12,231,426

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 filed by Patent Owner prior to institution. Petitioner’s objections apply equally to Patent Owner’s reliance on this evidence in any subsequently filed documents in this proceeding. These objections are timely, having been filed and served within ten business days of institution of trial on June 12, 2026.

Exhibit	Objections
Exhibit 2007 Katie Roof, <i>Risk Analytics Firm Qomplx to Go Public Via Casper CEO SPAC</i> , Bloomberg (Mar. 1, 2021, 11:16 PM UTC), https://www.bloomberg.com/news/articles/2021-03-01/risk-analytics-firm-qomplx-to-go-public-through-casper-ceo-spac (archived at http://archive.ph/3bpk2)	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. 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 references related articles that may provide essential context.
Exhibit 2008 <i>On Point: EP. 3 Taking Qomplx Public via SPAC with Jason Crabtree '08</i> , https://www.oldgradclub.com/on-point/blog-post-title-two-ffmmh	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence. FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.

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	<p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p> <p>FRE 106: Lack of completeness at least because the exhibit appears to lack portions, e.g., audio recordings, that may provide essential context.</p>
<p>Exhibit 2009 <i>West Point First Captains</i>, West Point Association of Graduates, https://www.westpointaog.org/about/history/west-point-first-captains/</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2010 Compilation of Awards Given to Jason Crabtree</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>

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<p>Exhibit 2011 <i>Jason Crabtree</i>, New America, https://www.newamerica.org/our-people/jason-crabtree/</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2012 <i>Meet the Team</i>, The Dakota Foundation, https://www.dakotafoundation.org/team</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2013 <i>Joe Panettieri, SPAC Cybersecurity Merger: Tailwind, QOMPLX Tackle Microsoft Active Directory Security</i>, MSSPALERT (Mar. 2, 2021), https://www.msspalert.com/news/spac-cybersecurity-merger-tailwind-qomplx-tackle-microsoft-active-directory-security</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting</p>

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	impermissible hearsay to the extent offered for their truth.
<p>Exhibit 2014 <i>Architect's Corner: Qomplx Leverages Automation to Run Stateful Services in Containers for the Financial and Cybersecurity Industries</i>, Portworx (Sept. 20, 2018), https://portworx.com/blog/devops-realized-qomplx-leverages-automation-run-stateful-services-containers-massive-scale/</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2015 Qomplx, Inc., <i>Qomplx CEO Jason Crabtree Wins Ernst & Young Entrepreneur of the Year® 2020 Mid-Atlantic Award</i> (Aug. 10, 2021), https://finance.yahoo.com/news/qomplx-ceo-jason-crabtree-wins-135600025.html</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2016 Sydney Lake, <i>Tysons Analytics Firm Qomplx Plans to go Public</i>, Virginia Business (Mar. 2, 2021), https://virginiabusiness.com/tysons-analytics-firm-qomplx-plans-to-go-public/</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p>

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	FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.
<p>Exhibit 2017 Tailwind Acquisition Corp., <i>Qomplx, Inc., Frequently Asked Questions About Tailwind Transaction</i>, https://www.sec.gov/Archives/edgar/data/1814215/000110465921033365/tm219025d2_425.htm</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2018 <i>Qomplx and Tailwind Acquisition Corp. Mutually Agree To End Business Combination Due to Market Conditions</i>, Business Wire (Aug. 17, 2021, 8:21 AM EDT), https://www.businesswire.com/news/home/20210817005565/en/QOMPLX-and-Tailwind-Acquisition-Corp.-Mutually-Agree-To-End-Business-Combination-Due-to-Market-Conditions</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2019 <i>Entrepreneurship Essentials for the Military Community</i>, USPTO, https://www.uspto.gov/about-us/events/entrepreneurship-essentials-military-community</p>	FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.

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	<p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2020 <i>2024 Veterans Innovation and Entrepreneurship Program</i>, USPTO, https://www.uspto.gov/about-us/events/2024-veterans-innovation-and-entrepreneurship-program</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2023 Declaration of Sam Malek, Ph.D.</p>	<p>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.</p> <p>FRE 702: The declaration includes improper expert testimony that does not cite sufficient facts or data or apply reliable principles and methods. <i>E.g.</i>, ¶¶ 37-43 rely on exhibits that do not support the opinions offered at least because they appear to be dated outside any relevant time period.</p>

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<p>Exhibit 2024 <i>Time Series Database Explained</i>, Influxdata, https://www.influxdata.com/time-series-database/ (accessed Mar. 5, 2026)</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p> <p>FRE 106: Lack of completeness at least because the exhibit appears to lack portions that may provide essential context.</p>
<p>Exhibit 2025 Marie Fayard, <i>Time Series Database (TSDB): A Guide With Examples</i>, Datacamp (updated Feb. 21, 2025), https://www.datacamp.com/blog/time-series-database</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>

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<p>Exhibit 2026 Piotr Grzesik & Dariusz Mrozek, <i>Comparative Analysis of Time Series Databases in the Context of Edge Computing for Low Power Sensor Networks</i>, Computational Science – ICCS 2020, 371</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2027 Niels de Waal, <i>Literature Study: Timeseries Databases</i> (Dec. 16, 2022)</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2028 Keith D. Foote, <i>A Guide to Time Series Databases</i>, Dataversity (Sept. 15, 2022), https://www.dataversity.net/articles/a-guide-to-time-series-databases/</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit</p>

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	<p>appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2029 <i>The Ultimate Guide to Time Series Databases</i>, KX, https://kx.com/time-series-database/ (accessed Apr. 7, 2026)</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2030 Alex Vondrak, <i>How Time Series Databases Work-and Where They Don't</i>, Honeycomb (Jan. 6, 2026), https://www.honeycomb.io/blog/time-series-database</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>

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<p>Exhibit 2031 <i>What Is a Time Series Database? How It Works + Use Cases</i>, Timeplus (Feb. 2, 2024), https://www.timeplus.com/post/time-series-database</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2033 Alexandre Gaillard, <i>Top 5 User Identity Verification Methods for 2025</i>, Investglass (updated July 3, 2025), https://www.investglass.com/top-5-user-identity-verification-methods-for-2025/</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board. <i>E.g.</i>, the exhibit appears to date from a period not relevant to any issue in dispute.</p> <p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p>
<p>Exhibit 2034 Douglas Downing, et al., <i>Dictionary Of Computer And Internet Terms</i> (Barron's Business Guides), 530 (12th ed. 2017)</p>	<p>FRE 901: The exhibit has not been authenticated, either by declaration or any other source of evidence.</p> <p>FRE 403: Any probative value is substantially outweighed by the risk of misleading the Board.</p>

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	<p>FRE 801/802: Out-of-court statements by third parties, constituting impermissible hearsay to the extent offered for their truth.</p> <p>FRE 106: Lack of completeness to the extent the exhibit lacks portions that may provide essential context.</p>

Respectfully submitted,

June 26, 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 June 26, 2026, the **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