

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

QOMPLX LLC,
Patent Owner.

Case IPR2026-00184
Patent 12,231,426

**PATENT OWNER'S OBJECTIONS
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence (“FRE”), Patent Owner Qomplx LLC (“Qomplx”) hereby objects to the following documents submitted by Petitioner Microsoft Corporation.

Nothing in this paper should be construed as an admission that any rights of Patent Owner would have been waived or forfeited had the paper or any objection herein not been filed, or that 37 C.F.R. § 42.64(b) applies to any of the objections herein if § 42.64(b) would not otherwise apply. The objections herein are premised upon § 42.64 potentially being determined to apply to the document in question, and are submitted solely to preserve the rights of Patent Owner should § 42.64(b) be determined to apply.

1. Exhibit 1002

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original.

2. Exhibit 1003

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant’s testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or

methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document includes testimony on patent law and practice.

3. Exhibit 1005

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original.

4. Exhibit 1020

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of

supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

5. Exhibit 1022

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority

date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

6. Exhibit 1041

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this

document is inadmissible because it has not been shown to be authenticated or identified.

7. Exhibit 1044

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document

constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

8. Exhibit 1048

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document includes testimony on patent law and practice.

9. Exhibit 1049

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that

the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

10. Exhibit 1050

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

11. Exhibit 1051

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the

art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

12. Exhibit 1052

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this

document is inadmissible because it has not been shown to be authenticated or identified.

13. Exhibit 1053

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

14. Exhibit 1054

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice,

confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

15. Exhibit 1055

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this

document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

16. Exhibit 1058

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting

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17. Exhibit 1060

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

18. Exhibit 1066

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. To the extent that this document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, it is inadmissible because it has not been shown to qualify as prior art under, inter alia, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for

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19. Exhibit 1068

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20. Exhibit 1069

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21. Exhibit 1070

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

22. Exhibit 1072

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time.

23. Exhibit 1073

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner

relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

24. Exhibit 1076

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

25. Exhibit 1077

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time.

26. Exhibit 1078

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and

its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

27. Exhibit 1079

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

28. Exhibit 1080

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61,

this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

29. Exhibit 1081

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

30. Exhibit 1082

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document is inadmissible because it has not been shown to be authenticated or identified.

31. Exhibit 1083

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion, and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified.

Respectfully submitted,

/Kenneth J. Weatherwax/
Kenneth J. Weatherwax (Reg. No. 54,528)
Nathan Lowenstein, *pro hac vice*
Colette Woo, *pro hac vice*
LOWENSTEIN & WEATHERWAX LLP

Date: June 26, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

**PATENT OWNER'S OBJECTIONS
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

The names and addresses of the parties being served are as follows:

Andrew M. Mason
Frank Morton-Park
Todd M. Siegel
Samuel B. Thacker

andrew.mason@klarquist.com
frank.morton-park@klarquist.com
todd.siegel@klarquist.com
samuel.thacker@klarquist.com
Msft-Qomplx@klarquist.com

Respectfully submitted,

/Gwynneth Orlino/

Gwynneth Orlino

Date: June 26, 2026