

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRATEGY INC.,
Petitioner,

v.

WEB3AI TECHNOLOGIES, LLC,
Patent Owner.

Case IPR2026-00223
Patent 9,218,574

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

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EXHIBITS

STRATEGY-1001	U.S. Patent No. 9,218,574 to Phillipps (“the ’574 Patent”)
STRATEGY-1002	Excerpts from the Prosecution History of the ’574 Patent (“the Prosecution History”)
STRATEGY-1003	Declaration and Curriculum Vitae of Dr. Michael Mitzenmacher
STRATEGY-1004	U.S. Patent App. Pub. No. 2004/0138932 to Johnson et al. (“Johnson”)
STRATEGY-1005	U.S. Patent No. 8,364,613 to Lin et al. (“Lin”)
STRATEGY-1006	U.S. Patent No. 5,727,161 to Purcell, Jr. (“Purcell”)
STRATEGY-1007	U.S. Patent App. Pub. No. 2013/0024160 to Mihaylov et al. (“Mihaylov”)
STRATEGY-1008	Complaint, <i>Web3AI v. MicroStrategy Incorporated</i> (originally 1-25-cv-00757, now 2:25-cv-00260-AWA-DEM) filed May 1, 2025
STRATEGY-1009	Corrected Memorandum in Support of Motion to Dismiss, <i>Web3AI v. MicroStrategy Incorporated</i> (2:25-cv-00260-AWA-DEM) filed January 8, 2026
STRATEGY-1010	U.S. Patent App. Pub. No. 2003/0229630 to Kamath et al. (“Kamath”)
STRATEGY-1011	U.S. Patent App. Pub. No. 2013/0024173 to Brzezicki et al. (“Brzezicki”)
STRATEGY-1012	U.S. Patent App. Pub. No. 2014/0089908 to Dunn et al. (“Dunn”)

STRATEGY-1013	U.S. Patent App. Pub. No. 2014/0337255 to Eads (“Eads”)
STRATEGY-1014	U.S. Provisional Patent App. No. 61/820,358 to Eads (“Eads Provisional”)
STRATEGY-1015	U.S. Patent App. Pub. No. 2014/0156566 to Kabiljo et al. (“Kabiljo”)
STRATEGY-1016	U.S. Patent No. 8,738,425 to Basu et al. (“Basu”)
STRATEGY-1017	U.S. Patent App. Pub. No. 2007/0203740 to Abu El Ata et al. (“Abu El Ata”)
STRATEGY-1018	U.S. Patent App. Pub. No. 2010/0241596 to Lee et al. (“Lee”)
STRATEGY-1019	U.S. Patent App. Pub. No. 2012/0284212 to Lin et al. (“Lin_II”)
STRATEGY-1020	U.S. Patent App. Pub. No. 2009/0106178 to Chu (“Chu”)
STRATEGY-1021	Excerpt from “Dictionary of Computer and Internet Terms,” 10th ed., Barron’s, 2009, by Downing et al.
STRATEGY-1022	Excerpt from “A Dictionary of Computing,” 6 th ed., Oxford University Press, 2008
STRATEGY-1023	Excerpt from “The New Penguin Dictionary of Computing,” Penguin Books, 2001, by Dick Pountain
STRATEGY-1024	Cheng, Jimming, and Mitzenmacher, Michael, “The MARKOV EXPERT for Finding Episodes in Time Series,” IEEE Data Compression Conference (DCC), 2005.
STRATEGY-1025	Deshpande, Prasad M., et al., “Caching multidimensional queries using chunks,” Proceedings of the 1998 ACM

SIGMOD International Conference on Management of Data, pp. 259-270, 1998.

STRATEGY-1026	Graefe, Goetz, “Query evaluation techniques for large databases,” ACM Computing Surveys (CSUR) 25, no. 2 (1993): 73-169.
STRATEGY-1027	“Introduction to Machine Learning,” 2 ed., MIT Press, 2010.
STRATEGY-1028	Ayodele, Taiwo Oladipupo, “Types of Machine Learning Algorithms,” Chapter 3 of “New Advances in Machine Learning,” InTech Publishing, 2010.
STRATEGY-1029	Chapter 1 of Murphy, Kevin P., “Machine Learning: A Probabilistic Perspective,” MIT, 2012.
STRATEGY-1030	U.S. Patent App. Pub. No. 2007/0282793 to Majors et al. (“Majors”)
STRATEGY-1031	Bier, Eric A. et al., “MMM: A User Interface Architecture for Shared Editors on a Single Screen,” pp. 79-86, ACM Symposium on User Interface Software and Technology (UIST) 1991.
STRATEGY-1032	Petitioner’s Stipulation
STRATEGY-1033	Office Action dated May 15, 2015, in Ser. No. 13/904,963
STRATEGY-1034	Examiner’s Interview Summary dated September 22, 2015, in Ser. No. 13/904,963
STRATEGY-1035	Amendment and Response to Office Action dated September 15, 2015, in Ser. No. 13/904,963
STRATEGY-1036	Examiner’s Search Notes and Search History

STRATEGY-1037	Notice of Allowance dated October 20, 2015
STRATEGY-1038	Email to Board re: Request for Call to Authorize Motion, dated April 17, 2026
STRATEGY-1039	Email from Strategy's litigation counsel to Web3AI's litigation counsel dated April 22, 2026
STRATEGY-1040	RESERVED
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I. INTRODUCTION

Strategy seeks referral and ultimately institution of review of its Petition, notwithstanding the grant by Judge Wright Allen of Strategy's motion to dismiss co-pending district court proceedings, for at least two reasons, which justify that PTAB resources are well-utilized under the circumstances.

Specifically, in this case, through its Request for Discretionary Denial, Web3AI seeks to evade USPTO scrutiny of the '574 patent for not a first, but a second time, and thus escape with a patent that would chill, not promote, innovation, given Web3AI's claim to settled expectations despite the presence of serious errors during examination of the type that the Director has recognized as material. As discussed below, Patent Office records show that the Examiner *never even attempted* to search for the new claim elements the Examiner relied on to grant the patent, leaving the claims issued in the '574 patent not only unsearched but, in effect, unexamined.

This is wholly inconsistent with the stated and admirable intentions of the Director and USPTO to resolve and support patents that are born strong. And Web3AI's antics do not stop with its request for denial on discretion, as we see Web3AI contemporaneously refuse to accept the district court's determination by appealing the Section 101 invalidity determination. Strategy has repeatedly sought

to minimize the resources expended by the Board and the parties, and Web3AI refused.

Strategy asks the Director to hold Web3AI accountable, after an original examination that saw the patent granted without proper examination, for its gamesmanship in weaponizing a determination that it seeks to turn through appeal that would have the patent emerge a second time without USPTO scrutiny. Strategy asks that the Director send a signal to demonstrate the commitment to supporting strong patents, and refute those who posture with inconsistency designed to frustrate that admirable goal.

II. REVIEW IS NEEDED DESPITE PARALLEL DISTRICT COURT PROCEEDINGS

The '574 patent is the subject of corresponding litigation in the Eastern District of Virginia. The court recently granted a motion to dismiss, on the basis that the '574 patent claims did not satisfy the requirements of Section 101. STRATEGY-1043, 21. A final court decision would obviate the need for *inter partes* review and would provide efficiencies to the parties and the Board. But the court's decision is not yet final, and despite Strategy's efforts to resolve the litigation and the IPR efficiently, Web3AI has appealed the court's decision and has chosen to prolong the proceedings. STRATEGY-1046, 1.

A. Web3AI Relies on the District Court Ruling While Seeking to Overturn It

In its Updated Mandatory Notices, Web3AI suggests that the district court's decision should justify denial of *inter partes* review. Paper 10. Yet Web3AI refuses to accept the court's decision and actively opposes it on appeal. The inconsistency of Web3AI's reliance on the court's decision before the Board while simultaneously seeking to overturn it should not allow the '574 patent to escape review. Moreover, now that Web3AI has appealed, denying institution would unfairly prejudice Strategy, which will be barred under 35 U.S.C. § 315(b) from bringing a IPR petition after the appeal is resolved.

B. Web3AI's Unwillingness to Resolve the Dispute Demonstrates that Review is Needed

The Board's *Hulu* decision expresses the value of efficiency in resolving patent disputes. *Hulu, LLC v. Piranha Media Distribution, LLC*, IPR2024-01252, -01253, Paper 27 at 2–3 (Apr. 17, 2025) (informative). Strategy shares the desire to efficiently resolve patent disputes, especially for this dispute that Web3AI chose to start and is choosing to prolong. In the interest of efficiency, Strategy has repeatedly sought to minimize the resources expended by the Board and the parties, including by seeking a stay of this IPR (*see* STRATEGY-1038) and by repeatedly reaching out to Web3AI in an attempt conclusively resolve both the litigation and IPR (*see* STRATEGY-1039).

Strategy's efforts to resolve the dispute—coupled with Web3AI's unwillingness to do the same—demonstrate a situation that is materially different from the one in *Hulu*. The Board should not unfairly grant Web3AI discretionary denial in the name of efficiency when Web3AI's conduct prolongs the dispute in direct opposition to the Board's aim to efficiently resolve patent disputes.

III. MATERIAL EXAMINER ERROR WARRANTS BOARD REVIEW

The Examiner's search history shows that the Examiner allowed the claims of the '574 patent without searching for the features relied on to overcome the prior art. This serious error was compounded by the Examiner's use of excessively narrow search queries that further excluded material and highly relevant prior art. As a result of these errors, the Examiner failed to consider key references, such as Johnson discussed at length in the Petition, that demonstrate that the '574 patent is invalid. The Board should review the merits of the Petition and institute review to correct these errors.

A. The Examiner Never Searched for the Amended Claim Features

The Office has rightly found it appropriate to reject discretionary denial of patents that have not been properly searched or examined resulting in the examiner's failure to find and consider material prior art. *See, e.g., USAA Federal Savings Bank v. Pacid Tech. LLC*, IPR2025-00697, Paper 9, 2-3 (August 14, 2025); *Western Digital Tech., Inc. v. Godo Kaisha IP Bridge 1*, IPR2025-00701, Paper 9,

2-3 (August 14, 2025); For example, the petition in *USAA* was referred for merits review in view of an examiner error to allow claims in a continuation without ever considering prior art related to the new claim language. IPR2025-00697, Paper 9, 2-3. In *Western Digital*, material error was found where the examiner allowed claims but failed to find and consider a key prior art reference that taught the features relied on to justify the allowance. IPR2025-00701, Paper 9, 2-3. The same harm that flows from those material errors—allowance and grant without ever considering key art that anticipates or renders obvious the claims—is also clearly present for the grounds advanced in the Petition.

The prosecution of the '574 patent was brief, involving only a single Office Action that rejected all of the original 26 claims. STRATEGY-1033, 2, 3-5, 15, 18-19. The Examiner's search history lists the search queries the Examiner used in March and April 2015, as part of preparing the Office Action. STRATEGY-1036, 3-7 (listing searches labeled S1 through S134).

After the Office Action, the Applicant conducted an examiner interview and submitted an amendment in response to the Office Action. STRATEGY-1034, 2; STRATEGY-1035, 2-10. The Examiner's interview summary mentions amendments, including “*elaboration on the precompute module*” in the claims which might lead to “possible allowance.” STRATEGY-1034, 2 (emphasis added).

When the Applicant amended the claims, the Applicant argued that claim 1 should be allowed for adding “a *pre-compute module* configured to predetermine, using the generated machine learning, permutations of the machine learning results . . . prior to the input module receiving the user input,” and that the other independent claims recite corresponding elements. STRATEGY-1035, 13-16 (emphasis added). In response, the Examiner allowed the application, with the reasons for allowance stated as: “See applicants’ arguments filed in the Remarks on pages 13-16.” Thus, the newly amended features such as the “pre-compute module” were the Examiner’s basis for issuing the ’574 patent.

However, the search history shows that the Examiner did not search for the new claim elements added by amendment. The search history lists a total of 20 searches being performed after the Office Action. STRATEGY-1036, 7-9 (listing searches labeled S135 through S154). None of these queries search for a pre-compute module, pre-computation or computation prior to a user’s input. *Id.* None of these queries search for the other new terms in the claims, such as a compiler, program code, and learned functions. *See id.*; STRATEGY-1045 (highlighting unsearched amended elements of claim 1).

Rather than search the new subject matter in the amendments, the Examiner copied and *reused* a few search queries from his review of the original claims. *See*

STRATEGY-1044, 1-2. In particular, nearly all of the Examiner's post-amendment searches reuse the search criteria of just four searches, labeled S65, S76, S87, and S89. *Id.*

The Examiner committed material error by failing to search for the newly amended features, and by allowing the application on the basis of features that were not searched. If the Examiner had searched for the new features added by amendment, he would have discovered the Johnson reference and the others cited in the Petition that demonstrate that the '574 patent is obvious.

B. The Examiner's Excessively Narrow Search Queries Improperly Excluded Material Prior Art

The Examiner also erred in using search queries that were excessively narrow. In keyword searching, it is standard to use a stemming operator, "\$," so that the search encompasses word variations with different endings, rather than an exact match. The Examiner knew about this operator, since it is used in some of his searches. STRATEGY-1036, 5 (e.g., "update\$" and "display\$" in search S76). However, the Examiner failed to use the operator consistently or appropriately, resulting in excessively narrow searches that required exact term matches and excluded material prior art.

For example, the Examiner's search S67 requires the term "predictive" in the same sentence as the exact terms "analytics" or "modeling." STRATEGY-

1036, 5. This improperly excluded references like Johnson that include the phrase “predictive analysis” (STRATEGY-1004, ¶ [0066]) and “predictive models” (*id.*, ¶ [0186]) that are essentially synonymous with the search terms and should have been included in the scope of the search. A search using standard stemming techniques would have included the Johnson reference and other material references. STRATEGY-1003, ¶¶ 155-156. The Examiner’s failure to appropriately use standard search techniques thus resulted in material error that removed relevant references from consideration.

C. The Failure to Find and Consider Johnson is a Material Error

The Johnson reference shows striking similarity to the pre-computation feature the Examiner relied on for allowance but never actually searched. For example, Johnson’s abstract shows the key feature of precomputing and retrieving results, as shown in the table comparing to portions of claim 1.

The ’574 Patent (STRATEGY-1001, Claim 1)	Johnson, (STRATEGY-1004, Abstract)
“predetermine, using the generated machine learning, permutations of the machine learning results . . . prior to the input module receiving the	“generating a set of output results using a business model, where the generating of the set of output results is performed prior

<p>user input;”</p> <p>“dynamically display, from the pre-compute module a second permutation of the one or more machine learning results in response to the input module receiving additional user input. . . .”</p>	<p>to a request by a user for the output results . . .”</p> <p>“receiving a user’s request for an output result . . . [and] if the requested output result has been generated in advance, retrieving the requested output result from storage and presenting the output result to the user.”</p>
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Other portions of Johnson provide even more extensive disclosure of the precomputation feature. STRATEGY-1004, title (“Generating business analysis results in advance of a request for the results”), ¶¶ [0071] (“results pre-calculated by the pre-loading logic”), [0098] (“pre-calculation of model output results”), [0157], [0159], [0160]; *see* Petition, 12-13, 26-29.

The Examiner’s failure to search for the features relied upon to justify allowance and the use of improperly narrow search terms demonstrate clear Examiner Material error in searching for relevant art. The Board should institute review of this improperly issued patent.

IV. STRATEGY'S IPR AND DISTRICT COURT POSITIONS ARE CONSISTENT

Strategy has maintained consistent positions regarding claim construction in both the district court and in the Petition. In both forums, Strategy explained that various claim elements of the '574 patent should be interpreted as means-plus-function elements under § 112(f). Petition, 3-10; STRATEGY-1009, 25-28. Strategy has also consistently asserted that the '574 patent recites various structures related to the means-plus-function terms, but the specification still does not meet all the requirements for legal sufficiency under § 112(f). *Id.*

Before the Petition was filed, Strategy realized that one paragraph in the district court briefing did not reflect the intended argument, so Strategy corrected it by filing a corrected brief with the court that removed five sentences from that single paragraph. STRATEGY-1009, 1, 36. Strategy's position is—and has always been—that the '574 patent *does* recite various structures related to the means-plus-function claim elements, and that these structures allow a comparison to the prior art, but that the issue of legal sufficiency under § 112(f) should be reviewed by the district court. Petition, 3-4; STRATEGY-1009, 25-28; EX2001, 25-30. Strategy has not shown any inconsistency in the proceedings that would justify denial of review by the Board.

V. DISCRETIONARY DENIAL IS NOT WARRANTED UNDER *FINTIV*

Fintiv does not support discretionary denial. Current statistics for the parallel

litigation suggest a trial would not occur until May 2029, nearly two years *after* the final written decision (FWD) deadline of July 2027. STRATEGY-1042 (indicating median 17.4 months time to trial), STRATEGY-1041 (indicating median 20.5 months to appeal disposition).

A. Factor 1: No Stay Has Been Requested

Fintiv Factor 1 is neutral, neither party has requested a stay.

B. Factor 2: The Board's Final Decision Will *Precede* Trial by Many Months

Fintiv Factor 2 favors institution. This factor considers the proximity of the district court's trial date to the Board's projected FWD date as part of a broader assessment of fairness and efficiency. *See Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 11, 5-6; *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 15, 7-17 (informative); *Illumina, Inc. v. Natera, Inc.*, IPR2019-01201, Paper 19, 6.

A FWD is due by July 2027. The parallel litigation involves (1) an appeal to the Federal Circuit, with a median 20 months to disposition, then (2) resumption of the district court case, with a median 17 months to trial. STRATEGY-1041; STRATEGY-1042. As a result, trial is not expected until May 2029, which is 22 months *after* the projected date of the FWD.

C. Factor 3: Limited Resources Would Have Been Expended by the Time of the Decision on Institution

Fintiv Factor 3 favors institution. The district court case has not progressed beyond briefing on a Motion to Dismiss, and there is no discovery expected to occur before the due date of the FWD while the district court decision is appealed. Indeed, for a standard patent case, there has been close to the bare minimum of time and resources invested by the district court and parties in the parallel proceeding.

D. Factor 4: No Overlap Between This IPR and the District Court Proceeding Exists

Fintiv Factor 4 strongly favors institution. Strategy has filed a broad stipulation (STRATEGY-1032) that goes beyond *Sotera*, agreeing not to pursue in district court:

- “the specific grounds asserted in the instituted IPR,”
- “any ground that could have been reasonably raised in the instituted IPR (i.e., any ground that could have been reasonably raised under §§ 102 or 103 on the basis of prior art patents or printed publications),” and

- “any other ground based on a combination of any prior art reference asserted as the basis of a ground in the instituted IPR with any system prior art.”

Strategy’s stipulation thus eliminates overlap and aligns with PTAB precedent favoring institution. *See Apple, Inc. v. SEVEN Networks, LLC*, IPR2020-00156, Paper 10 at 19 (PTAB June 15, 2020); *Sand Revolution II*, Paper 24, 12; *Google LLC v. Flypsi, Inc.*, IPR2023-00360, Paper 9, 36-39 (PTAB Aug. 2, 2023).

E. Factor 5: The Same Parties are in the Related Litigation

The parties are the same in this IPR and the related Virginia litigation.

F. Factor 6: Web3AI’s Identified “Other Circumstances” Lack Merit and Do Not Weigh in Favor of Discretionary Denial

As discussed below, the merits of the Petition are strong, which weighs in favor of institution.

VI. THE MERITS OF THE PETITION ARE STRONG

The Petition presents compelling reasons why the claims of the ’574 patent are obvious and thus should be cancelled. For example, even Johnson’s *title* teaches the key feature of precomputing results before a user’s request, which served as the basis for the Examiner’s allowance of the ’574 patent. STRATEGY-1004, title (“Generating business analysis results in advance of a request for the results”). The Board should refer Strategy’s Petition for a determination on the merits, so the strong

reasons justifying institution can be appropriately evaluated.

A. Obviousness Grounds Do Not Indicate Weakness

Grounds of invalidity under Section 103 (rather than under Section 102) in no way diminish the strength of the merits of the Petition. The Board's role in reviewing patents for obviousness is just as important as reviewing for anticipation.

B. The Petition Does Not Excessively Rely on Expert Testimony

The testimony of Strategy's expert is corroborated with extensive citations, both to the prior art in the Petition's obviousness grounds and also to other dictionary entries, journal articles, patents, and patent applications. Web3AI criticizes only a single position of Dr. Mitzenmacher, his discussion of the term "compiler." Request for Discretionary Denial, Paper 8, at page 12. However, Web3AI neglects that the testimony on this issue is supported by:

- definitions from *three different dictionaries* (see STRATEGY-1003, ¶¶ 39, 162-163 (citing STRATEGY-1021, STRATEGY-1022, and STRATEGY-1023)), and
- corroborating disclosure of *four additional prior art patent documents* (see STRATEGY-1003, ¶¶ 21-22, 100-101 (citing to STRATEGY-1012 through STRATEGY-1015)).

This is far from a situation of overreliance on expert testimony or a lack of corroborating evidence.

VII. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this case proceed to an institution determination on the merits.

Respectfully submitted,

Dated: April 27, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4) and 42.205(b), the undersigned certifies that on April 27, 2026, a complete and entire copy of this Petitioner's Opposition to Patent Owner's Request for Discretionary Denial and Accompanying Exhibits were provided by email to the Patent Owner by serving the correspondence email address of record as follows:

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