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Bcc: [Director_DI](#)
Subject: FW: IPR2026-00298 (Microsoft v Qomplx) – Petitioner Request for Authorization to File Preliminary Reply
Date: Thursday, July 2, 2026 8:01:00 AM
Attachments: [image001.png](#)

Petitioner is authorized to file a 5-page preliminary reply in IPR2026-00298, due no later than July 8, 2026, limited to addressing the issues raised in Petitioner's email below. Patent Owner is authorized to file a 5-page preliminary sur-reply in IPR2026-00298, due no later than July 13, 2026, limited to addressing the same issues.

The parties should file their briefs as papers in P-TACTS. The parties are not authorized to file any evidence at this time.

From: andrew.mason@klarquist.com <andrew.mason@klarquist.com>
Sent: Monday, June 29, 2026 11:04 PM
To: Director_DI <Director_DI@uspto.gov>
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Subject: IPR2026-00298 (Microsoft v Qomplx) – Petitioner Request for Authorization to File Preliminary Reply

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Dear Director,

In IPR2026-00298, Petitioner Microsoft Corporation respectfully requests authorization to file an 8-page preliminary reply to Patent Owner's Preliminary Response (Paper 8, "POPR"). Petitioner notified Patent Owner of its intent to seek this relief within three business days of service of the POPR. If authorized, Petitioner would not oppose Patent Owner filing an equal-length sur-reply.

Good cause exists because, as detailed below, the POPR rests on characterizations that materially misstate Petitioner's positions, relies on testimonial evidence in Exhibit 2001, and depends on unduly narrow readings of the claim language. A short preliminary reply addressing these issues would facilitate an accurate understanding of the Petition and the POPR, without expanding the scope of the issues already presented. Patent Owner contends these issues are dispositive, so focused briefing from both sides would assist the Director in deciding institution.

While Petitioner disputes all of the POPR's arguments, Petitioner seeks leave to address the following issues:

1. **"Respective first data" / "distributed computational graph"** (e.g., POPR, 6-13). The POPR argues that the Petition inconsistently identifies the claimed "respective first data," relying

heavily on an expert declaration (EX2001). Petitioner seeks to show how the Petition advances a single mapping and how the POPR fragments that mapping to manufacture an alleged inconsistency. Petitioner also seeks to address the POPR's unduly narrow reading of the claimed "data represents a respective portion of a distributed computational graph," which is inconsistent with the description in the '424 patent.

2. **Claim 9's "second transformation pipeline"** (e.g., POPR, 15-20). The POPR argues that the Petition relies on claim 1 by reference and does not independently map this limitation. Petitioner seeks to show how the Petition and supporting declaration provide an independent mapping that directly addresses the different claim language. Petitioner also seeks to address the POPR's unduly narrow reading of "transformation pipeline" to require a linear, single stream, which is inconsistent with the description in the '424 patent and the non-linear pipelines recited in claims 2 and 10.
3. **"Third computer system"** (e.g., POPR, 21-29). The POPR argues that the Petition relies on the wrong prior-art component and does not show the required "cause ... to execute." Petitioner seeks to explain how the Petition consistently maps the same component and that the cited disclosures satisfy the causal relationship the claims require. Petitioner also seeks to address the POPR's unduly narrow reading of "cause ... to execute software instructions," which appears to demand a more explicit execution-trigger mechanism that is not described by the '424 patent.
4. **Motivation to combine Barsness with Chakradhar** (e.g., POPR, 34-40). The POPR characterizes the combination as requiring Chakradhar's full controller-driven update architecture, but that overstates the Petition's position and overlooks the Petition's primary rationale for the combination. Petitioner seeks to show how the POPR misstates the role of Chakradhar's route-maps in the proposed combination.

Petitioner has conferred with Patent Owner, which opposes this request and states as follows: Patent Owner objects to Petitioner's email, which contains improper argument in violation of the Board's rules and fails to show good cause. Petitioner had the burden to address why any challenged claims could be unpatentable in its Petition, which is only 34 words short of the word limit. Petitioner believes that the Director is capable of assessing issues such as "how the Petition advances a single mapping," "how the Petition and supporting declaration provide an independent mapping," "how the Petition consistently maps the same component," and whether Patent Owner "overlooks the Petition's primary rationale for the combination" without supplemental briefing. To the extent any request is granted, Patent Owner requests a sur-reply of equal length, and believes that the preliminary reply should be no more than 5 pages.

Respectfully submitted,

Andy Mason
Lead Counsel for Petitioner Microsoft

