UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

QOMPLX LLC, Plaintiff, v. MICROSOFT CORPORATION, Defendant.	))))))))))	Civil Action No. 1:25-cv-01383-ADA

PLAINTIFF QOMPLX LLC'S
PRELIMINARY DISCLOSURE OF PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Amended Scheduling Order (D.I. 43), Plaintiff QOMPLX LLC ("Qomplx") hereby provides Defendant Microsoft Corporation ("Microsoft") with its preliminary proposed constructions for the claim terms proposed for construction by the parties on February 17, 2026.

This disclosure is preliminary. Microsoft has failed to comply with the Court's orders that it produce, with its January 26, 2026 invalidity contentions, "technical documents, including software where applicable, sufficient to show the operation of the accused product(s)." *See* Amended Scheduling Order (D.I. 43) at 2; Standing Order Governing Proceedings (OGP)—Patent Cases § II(4) (March 5, 2025). Indeed, as of the date of this disclosure, Microsoft has produced only 375 documents, over 300 of which are alleged prior art documents cited in its invalidity contentions, and the remainder of which are publicly available user-facing documentation—despite Qomplx having repeatedly requested Microsoft to remedy the deficiencies in its incomplete Court-ordered production. Critically, Microsoft's production contains not a single internal or non-public Microsoft document describing any of the features that Qomplx has accused of infringement and charted in its November 24, 2025 infringement contentions, nor a single line of source code for any of these features—which are software-based and whose operational details are not publicly

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available. Microsoft has improperly taken the position that the Court's Interim Protective Order is purportedly insufficient to protect its confidential documents and code, and on that apparent basis has not produced any confidential document to date. But the parties reached agreement on a stipulated protective order in lieu of the Interim Protective Order before the date of this disclosure, and Microsoft has still failed to even commit to a date certain to produce the materials it should have produced on January 26.

Qomplx has been prejudiced with respect to the claim construction process by Microsoft's willful failures, including in the selection of appropriate claim terms and the development of appropriate constructions. Accordingly, Qomplx expressly reserves the rights to supplement, revise, modify, and/or otherwise finalize the below disclosure of proposed terms once Microsoft has complied with the Court's orders, including by producing "technical documents, including software where applicable, sufficient to show the operation of the accused product(s)," as Microsoft was required to do by January 26, 2026.

Qomplx also expressly further reserves such rights based upon additional information or analyses, information learned through the course of discovery or otherwise, or in response to the terms, claim elements, and/or constructions proposed by Microsoft.

Qomplx's Proposed Constructions

U.S. Patent No(s).	Term	Construction
11,539,663	"midserver"	"a server that functions as an interface between an external network and a cloud-based service, and which runs one or more containerized services that perform one or more of: collecting, aggregating, analyzing, filtering, transforming, and securely transmitting data"
	"virtual appliance software application"	"a cloud-based service delivered as a software stack that utilizes one or more virtual systems"
12,143,424	"distributed computational graph"	Plain and ordinary meaning.
	"pipeline", "transformation", "transformation pipeline"	Plain and ordinary meaning.
12,218,934, 12,231,426	"retrieving, from the multidimensional time-series database, historical information about previous access requests associated with the user account, and determining, based at least on the historical information", "retrieving, from the multidimensional time-series database, historical information about previous access requests associated with the first user account, and determining, based at least on the historical information"	The "determining" step takes place after the "retrieving" step. Both steps take place after receipt of "a request to authenticate a client."

12,301,627, 12,301,628	"account"	Plain and ordinary meaning.

Dated: March 2, 2026

/s/ Ian R. Washburn
Paige Arnette Amstutz
Texas Bar No. 00796136
pamstutz@scottdoug.com
Robert Pierce "Robby" Earle
Texas Bar No. 24124566
rearle@scottdoug.com
SCOTT DOUGLASS MCCONNICO LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
Tel: (512) 495-6300
Fax: (512) 495-6399

Alan J. Heinrich (*pro hac vice*)
aheinrich@irell.com
Ian R. Washburn (*pro hac vice*)
iwashburn@irell.com
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 90067
Tel: (310) 277-1010
Fax: (310) 203-7199

Attorneys for Plaintiff QOMPLX LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2026, all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via e-mail.

/s/ Eli Levinson
Eli Levinson