IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

QOMPLX LLC, *Plaintiff,* v. MICROSOFT CORPORATION, *Defendant.*	Case No. 1:25-cv-01383-ADA

DEFENDANT'S PRELIMINARY CLAIM CONSTRUCTIONS

Pursuant to the Amended Scheduling Order (Dkt. 43), Defendant Microsoft Corporation ("Defendant") provides the following preliminary proposed claim constructions. Defendant reserves the right, consistent with the Federal Rules of Civil Procedure and the rules of this Court, to supplement, modify, or withdraw its proposed claim terms for construction, or to revise its proposed constructions, including in view of Plaintiff's forthcoming proposed constructions, or to reach a comprise on proposed constructions.

Claim Term	Defendant's Preliminary Proposed Construction
"distributed computational graph" ('424 patent, claims 1, 4, 6)	A directed graph with each transformation comprising a node and the output messages between transformations comprising edges.
"transformation pipeline" / "pipeline" ('424 patent, claims 1-6, 9-12)	A progression of functions which each perform a transformation on a data stream.
"transformation" ('424 patent, claims 1-6, 9-12)	A function performed on zero or more streams of input data which results in a single stream of output.
"midserver" ('663 patent, claims 1, 3-4)	Plain and ordinary meaning.
"virtual appliance software application" ('663 patent, claims 1, 4)	Plain and ordinary meaning.
"retrieving, from the multidimensional time-series	Plain and ordinary meaning.

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database, historical information about previous access requests associated with the [first] user account, and determining, based at least on the historical information" ('426 patent, claims 1, 9; '934 patent, claims 1, 11, 18, 26)	
"account" ('627 patent, claims 1, 18; '628 patent, claims 1, 11)	Plain and ordinary meaning.

Dated: March 2, 2026

Respectfully submitted,

/s/ Robert Buergi

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CERTIFICATE OF SERVICE

I certify that on March 2, 2026, a true and correct copy of the foregoing document was served via email to all counsel of record.

/s/ Robert Buergi
Robert Buergi