

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

QOMPLX LLC,
Patent Owner.

IPR2026-00326
Patent 12,301,628

**PETITIONER’S PRELIMINARY REPLY TO
PATENT OWNER’S PRELIMINARY RESPONSE (“POPR”)**

Petitioner submits this authorized Reply to the POPR (Paper 10).

The POPR rests on the false premise that the Petition’s “mapping depends on equating Brezinski’s disclosed events with the claimed relationships.” POPR, 1; *see also id.*, 8. The Petition explains the role of, and distinction between, events, event data, and relationships in the Brezinski system. It explains how Brezinski receives event data, processes that data to identify entity-to-entity relationships, and represents event-derived relationships as edges in its graph. While Brezinski’s graph edges are generated from event data, they do not represent only events; they also correspond to and represent relationships between entities.

Brezinski’s event data includes event descriptions identifying the initiating entity, target entity, event type, and timestamp, and its analysis device uses that data to generate graph edges connecting entity-nodes. Pet., 26–31, 34–35; EX1004, 5:65–6:10, 6:37–46, 17:23–26. These edges correspond to the event-derived relationships, consistent with Brezinski’s explanation that graphs represent “relationships between objects” as edges (EX1004, 2:32–37) and with its depiction of edges as lines connecting nodes (e.g., *id.*, FIG. 4). Pet., 19–22. Each such edge thus corresponds to the entity-to-entity relationship identified from the event data. Pet., 26–28; EX1004, 6:37–7:32, 8:29–9:3.

The Petition’s mapping is consistent with the ’628 patent’s own disclosure that “the relationship between two nodes makes up an edge” (EX1001, 7:47–51);

event data is used to “[p]roduce a visualization of physical and logical relationships” (*id.*, Fig. 11; *see also id.*, 24:5–16); and the graph visualization represents “physical or logical connections between [nodes] as edges” (*id.*, 28:17–21). *See also id.*, 23:37–57, Fig. 10; POPR, 16 (“The claims ... contemplate using event data to identify relationships.”). The Petition also explains that Brezinski processes “additional event data” to incorporate additional edges corresponding to “recently detected events,” thereby identifying relationships not represented by the original edges. Pet., 34–37; EX1004, 17:23–26.

The POPR attempts to improperly narrow the definition of “relationship.” The claims require no relationship label, identification of a relationship type, or particular duration. EX1001, cls. 1, 11. Nor are “event” and “relationship” mutually exclusive: event data describing an interaction may identify a relationship, even though not every relationship need reflect an event. Brezinski’s event data reflects interactions such as network connections, communications, logins, and resource or process access. EX1004, 6:37–7:32. The ’628 patent confirms that a connection may be a relationship: it updates a CPG “[w]hen a new connection is detected,” and Figure 22 depicts “HasSession” as an edge-represented relationship where one device “has connected” to another. EX1001, 25:28–32, 28:53–60, Figs. 16, 22. Even PO’s cited dictionary aligns with the Petition’s mapping, as Brezinski’s edges reflect the entities’ “state of being related or

interrelated.” POPR, 15–16; EX2004, 1.

The Petition demonstrates how Brezinski uses a modified graph to perform a correlation. The claims neither require Brezinski to use the word “correlate” nor prescribe a particular correlation algorithm. *See* POPR, 33–37. The claim language specifies the required operation: using the modified graph to identify nodes associated with an anomalous event and connected by graph edges in the modified graph. EX1001, 35:31–34 (cl. 1), 37:28–41 (cl. 11). And the specification states only that “correlations may be identified by first comparing resources involved in the anomaly,” such as accessed resources. EX1001, 21:16–25 (quoted in Pet., 4). The Petition maps that “correlation” to Brezinski’s use of a modified graph to traverse connected edges and vertices from anomalous activity to identify the connected graph elements associated with that activity. Pet., 41–43. That is graph-based correlation under the claims: the anomalous event provides the starting point, the modified graph supplies the edge-connected structure, and the traversal identifies the connected nodes and edges. Calling the operation “traversal” does not make it any less the claimed correlation. Brezinski’s use of “correlation” to describe a different operation does not preclude the relied-on traversal from satisfying the correlation described and claimed in the ’628 patent.

Respectfully submitted,

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CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6(e)(4)

The undersigned certifies that on July 28, 2026, the PETITIONER'S
PRELIMINARY REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE
("POPR") was served via email to counsel for the Patent Owner as follows:

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