

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

QOMPLX LLC,
Patent Owner.

Case IPR2026-00326
Patent 12,301,628

PATENT OWNER'S PRELIMINARY SUR-REPLY

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EXHIBIT LIST	
2001	Declaration of Nathan Lowenstein in Support of Notice of Intent
2002	Declaration of Colette Woo in Support of Notice of Intent
2003	Declaration of Sam Malek, Ph.D.
2004	Relationship, MERRIAM-WEBSTER.COM DICTIONARY, https://www.merriam-webster.com/dictionary/relationship (accessed July 8, 2026) [Merriam Webster – Relationship]
2005	Event, MERRIAM-WEBSTER.COM DICTIONARY, https://www.merriam-webster.com/dictionary/event (accessed June 10, 2026) [Merriam Webster – Event]

All emphases are added unless otherwise stated.

I. “Relationship Between A Respective Pair Of Entities.”

The POPR demonstrated that the Petition failed to demonstrate that each of Brezinski’s event-edges “corresponds to a respective relationship between a respective pair of entities” or that Brezinski identifies a relationship that “does not correspond” to a first-plurality relationship. POPR, 8-33. The claims separately recite “event” and “relationship,” yet the Petition maps the same Brezinski event-edges to both without explaining how a particular event also corresponds to a relationship. *Id.* The Reply confirms the defect.

Petitioner does not dispute that the claimed “event[s]” and “relationship[s]” are presumed to have different meanings or that the specification treats them as distinct. *See* Reply, 1-3; POPR, 9-16. Instead, Petitioner argues that “the claims require no relationship label, identification of a relationship type, or particular duration.” Reply, 2. But PO proposed none of those requirements. POPR, 9-16. PO argued only that Petitioner must show that Brezinski’s event-edges correspond to the claimed relationships, not simply relabel events as relationships. *Id.*

Petitioner also argues that “‘event’ and ‘relationship’ [are not] mutually exclusive” because “event data describing an interaction may identify a relationship even though not every relationship need reflect an event.” Reply, 2. But that confirms PO’s distinction: event data may be used to identify or infer a relationship, but the event is not automatically the relationship. *See* POPR, 9-16. Petitioner’s

“HasSession” example confirms the point. Reply, 2. A logon event may supply data from which a HasSession relationship is identified, but Petitioner never shows that Brezinski performs that identification. *Id.*

The Reply asserts—without citation—that “[t]he Petition explains the role of, and distinction between, events, event data, and relationships in the Brezinski system.” Reply, 1. It does not. The Reply’s new label—“event-derived relationships”—does not identify any Brezinski analysis that derives relationship information distinct from the event record itself. *Id.*, 1-3. Nor does Petitioner reconcile the Petition’s treatment of the same edges as relationships for limitation [1.5] and events for limitation [1.10.a]. *See* POPR, 19-20; Reply, 1-3; Pet., 28, 39-40. Instead, it repeats the very conclusion in dispute: Brezinski’s edges “do not represent only events” but “also correspond to and represent relationships.” Reply, 1. Repeating the Petition’s conclusion does not satisfy Petitioner’s burden.

For the newly identified relationship, the Reply does not answer the POPR’s argument. It merely repeats the Petition’s assertion that adding “additional edges” identifies “relationships not represented by the original edges.” Reply, 2. But the claims separately require identifying a relationship that does not correspond to any first-plurality edge and adding a new edge corresponding to that relationship. POPR, 27-31. Showing that the added edge is new addresses only the second requirement; it does not establish the first. The Reply thus leaves the POPR’s argument

unrebutted and continues to collapse the two requirements, reading “does not correspond” out of the claims.

II. “Perform A First Correlation ... To Identify A First Plurality Of Correlated Nodes.”

The POPR demonstrated that the Petition maps Brezinski’s traversal to the claimed “first correlation” without explaining why traversal is correlation and even though Brezinski separately describes correlation when generating the graph and traversal as a later process. POPR, 33-43. The Reply does not dispute that mapping or that the Petition ignores Brezinski’s express correlation teachings. Reply, 3. Instead, Petitioner argues that the claims do not require Brezinski to use “correlate” or prescribe a particular algorithm. *Id.* That misses the point: Petitioner must still show that the relied-upon traversal is a correlation. Petitioner’s assertion that the claim requires only “using the modified graph to identify nodes” writes “perform a first correlation” and “correlated” out of the claim. Calling traversal “graph-based correlation” because it identifies connected graph elements merely relabels Brezinski’s search-and-selection process without explaining why it is correlation. Nor does Petitioner’s citation to the ’628’s specification help: its example compares resources involved in an anomaly and further correlates them with other events; it does not merely follow graph edges. Ex. 1001 [’628] 21:16-25. Petitioner still fails to prove that Brezinski’s traversal is the claimed correlation.

Respectfully submitted,

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Date: July 31, 2026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following document was served by electronic service, by agreement between the parties, on the date below:

PATENT OWNER'S PRELIMINARY SUR-REPLY

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