IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PALO ALTO NETWORKS, INC.,

Petitioner,

v.

QOMPLX LLC,

Patent Owner.

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IPR2026-00431

U.S. Patent No. 12,301,627

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PETITIONER'S RANKING OF PARALLEL PETITIONS

Petitioner hereby notes that, on May 15, 2026, Petitioner filed a Petition against the '627 patent, in Case No. IPR2026-00364, which is a "copycat" of the Petition filed by Microsoft in IPR2026-00325 ("Copycat Petition"). The Copycat Petition challenges claims 1-3, 5-6, 11-14, 16-18, 22, 24, and 27-28 as obvious in view of Stokes and Crabtree, and challenges claim 3 as obvious in view of Stokes, Crabtree, and Sekar. Thus, this Petition and the Copycat Petition challenge mutually exclusive sets of claims. In the Copycat Petition proceeding, Petitioner has moved for joinder to Microsoft's IPR proceeding in IPR2026-00325.

The Board's Consolidated Practice Guide requests that, for parallel petitions against the same patent, the Petitioner provides "(1) a ranking of the petitions in the order in which it wishes the Board to consider the merits, if the Board uses its discretion to institute any of the petitions, and (2) a succinct explanation of the differences between the petitions, why the issues addressed by the differences are material, and why the Board should exercise its discretion to institute additional petitions if it identifies one petition that satisfies petitioner's burden under 35 U.S.C. § 314(a)." Consolidated Trial Practice Guide at 60.

Ranking. Petitioner provides the following ranking of the Petitions in the order it wishes the Board to consider the merits: (1) this Petition (IPR2026-00431), (2) the Copycat Petition (IPR2026-00364).

Explanation. The differences between the two Petitions are reflected in the below table.

Ground	Basis	Reference(s)	Claims
This Petition (IPR2026-00431)			
1	§103	Stokes, Crabtree	9, 10, 15, 19
2	§103	Stokes, Crabtree, Sekar	20, 21
Copycat Petition (IPR2026-00364)			
1	§103	Stokes, Crabtree	1-3, 5-6, 11-14, 16-18, 22, 24, 27-28
2	§103	Stokes, Crabtree, Sekar	3

This petition challenges several dependent claims of the '672 patent that were not challenged in the Copycat Petition nor Microsoft's petition. Petitioner Palo Alto Networks filed the Copycat Petition because Patent Owner has asserted those claims against Petitioner in the parallel litigation. However, while Patent Owner has asserted claims 9, 10, 15, 19, 20, and 21 against Petitioner Palo Alto Networks, Patent Owner has not asserted those claims against Microsoft—and thus Microsoft did not challenge them. Accordingly, Petitioner had good reason to file a second Petition to challenge additional claims that have only been asserted against Petitioner.

Petitioner could not have filed a single Petition challenging the claims in both this Petition and the Copycat Petition, because it is likely a hypothetical single Petition would have been denied for discretionary reasons. Such a petition would have presented significant overlap with Microsoft's IPR, and therefore would have

required the unnecessary expenditure of additional Board resources to resolve overlapping issues. However, a single Petition would not have been granted joinder to Microsoft's IPRs because, by challenging additional claims, it would present new issues. *Facebook, Inc. v. Windy City Innovations, LLC*, 973 F.3d 1321, 1333 (Fed. Cir. 2020) ("The clear and unambiguous text of § 315(c) does not authorize … the joinder of new issues.").

Petitioner's decision to file separate Petitions therefore is the most efficient use of Board resources. The Copycat Petition, if instituted and joined to Microsoft's IPR, would not require the expenditure of additional resources as the presented issues are in complete overlap with Microsoft's IPR. This Petition is narrowly tailored to only those claims asserted against Petitioner Palto Alto Networks that Microsoft did not challenge, thereby minimizing the amount of Board resources needed to resolve the narrow set of unique issues presented in this Petition.

Date: July 20, 2026

Respectfully submitted,

By: /s/ *James M. Glass*

James M. Glass
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
295 5th Ave., 9th Floor
New York, NY 10016
Tel: (212) 849-7000
Fax: (212) 849-7100

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 20, 2026, true and correct copies of the foregoing document and supporting materials were served in its entirety on the Patent Owner at the following address of record as listed on PAIR via First-Class Mail:

NK Patent Law
4101 Lake Boone Trail, Suite 218
Raleigh, NC 27607

Official Correspondence Address

Courtesy copies were also sent via electronic mail to Patent Owner's counsel of record in the related district court proceeding

aberger@irell.com
cwen@irell.com
dslusarczyk@irell.com
iwashburn@irell.com
claire@millerfairhenry.com

Date: July 20, 2026

By: */s/ James M. Glass*
James Glass
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
295 5th Ave., 9th Floor
New York, NY 10016
Tel: (212) 849-7000
Fax: (212) 849-7100

Counsel for Petitioner