
From: Jeremy Thomas
Sent: Tuesday, September 1, 2026 6:30 PM
To: #Q-PAN; Berger, Aron; dslusarczyk@irell.com; Claire Henry; Washburn, Ian; cwen@irell.com
Cc: QE-PAN-Qomplx; Smith, Melissa (EXTERNAL)
Subject: Qomplx v Palo Alto Networks - Amended Invalidity Contentions Cover Pleading
Attachments: 2026.09.01 - [redline] Amended Invalidity Contentions Cover Pleading.pdf; 2026.09.01 - Amended Invalidity Contentions Cover Pleading.pdf

Counsel,

Palo Alto Networks' does not intend to argue in this case that any of the terms in the asserted claims of the '425, '627 and '424 patents are indefinite with the exception of the term "substantially in real time," which is found in the claims of the '424 patent. Attached please find an amended invalidity contentions cover pleading reflecting this, along with a redline showing the changes from the original pleading. The only changes were to remove the defense of indefiniteness for terms in the '627, '425 and '424 patents.

With respect to the term "substantially in real time" in the '424 patent claims, Palo Alto Networks maintains that this term is indefinite because the outer boundaries of what constitutes "substantially in real time" are unclear.

Regards,

Jeremy

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