

Filed on behalf of: Orca Security Ltd.

Entered: July 3, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WIZ, INC.,
Petitioner,

v.

ORCA SECURITY LTD.,
Patent Owner.

IPR2024-00864
Patent 11,663,032

**PATENT OWNER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF NICOLE ELENA BRUNER
UNDER 37 C.F.R. § 42.10(c)**

Exhibit List

Exhibit	Description
2001	Declaration of David R. Kaeli, Ph.D. (“Kaeli Decl.”)
2002	<i>Curriculum Vitae</i> of David R. Kaeli, Ph.D.
2003	RESERVED
2004	RESERVED
2005	U.S. Pat. App. Pub. No. 2008/0320583 A1 (“Sharma”)
2006	<i>Virtual Machine Snapshots, Red Hat Virtualization 4.3: Technical Reference: The Technical Architecture of Red Hat Virtualization Environments</i> (updated Apr. 20, 2020), https://docs.redhat.com/en-us/documentation/red_hat_virtualization/4.3/pdf/technical_reference/Red_Hat_Virtualization-4.3-Technical_Reference-en-US.pdf (excerpt) (“Red Hat Virtualization 4.3 – <i>Virtual Machine Snapshots</i> ”)
2007	Dominik Birk, <i>Technical Challenges of Forensic Investigations in Cloud Computing Environments</i> (Jan. 12, 2011), https://cachin.com/cc/csc2011/submissions/birk.pdf (last visited Sept. 7, 2024) (“Birk, <i>Technical Challenges</i> ”)
2008	RESERVED
2009	RESERVED
2010	U.S. Pat. No. 9,467,465 B2 (“Hibbert”)
2011	U.S. Pat. No. 10,298,599 B1 (“Zhang”)
2012	U.S. Pat. No. 9,594,912 B1 (“Thioux”)
2013	RESERVED
2014	Complaint for Patent Infringement, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. July 12, 2023), ECF No. 1 (“Orca Compl.”)

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2015	Oral Order (Joint Motion for Discovery Dispute Teleconference), <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. May 17, 2024), ECF No. 62 (“Oral Order”)
2016	Defendant Wiz, Inc.’s Initial Invalidity Contentions, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (“Pet’r’s Invalidity Contentions”)
2017	RESERVED
2018	Abraham Silberschatz et al., <i>Operating System Concepts</i> (9th ed. 2013) (excerpt)
2019	RESERVED
2020	MahMush, <i>Snapshots vs. Images – Which One to Choose?</i> , Huawei (Sept. 15, 2021, 17:55:10), https://forum.huawei.com/enterprise/en/snapshots-vs-images-which-one-to-choose/thread/773699-893 (“Huawei - <i>Snapshots vs. Images</i> ”)
2021	Amazon Web Service (AWS), <i>What Is a Hypervisor?</i> (2024), https://aws.amazon.com/what-is/hypervisor/ (last visited Sept. 11, 2024)
2022	Diego Perez-Botero et al., <i>Characterizing Hypervisor Vulnerabilities in Cloud Computing Servers</i> , Conference: Proceedings of the Workshop on Security in Cloud Computing (SCC), Hangzhou, China 1–8 (May 8, 2013) (“Perez-Botero, <i>Characterizing Hypervisor Vulnerabilities</i> ”)
2023	U.S. Pat. No. 8,220,053 B1 (“Sun”)
2024	Jinpeng Wei et al., <i>Managing Security of Virtual Machine Images in a Cold Environment</i> , Conference: Proceedings of the First ACM Cloud Computing Security Workshop (CCSW), Chicago, Illinois 1–6 (Nov. 13, 2009) (“Wei, <i>Managing Security of Virtual Machine Images</i> ”)

Exhibit	Description
2025	Red Hat, <i>Red Hat OpenStack Platform 11: Instances and Images Guide – Managing Instances and Images</i> (updated Feb. 19, 2018), https://docs.redhat.com/en-us/documentation/red_hat_openshift_platform/11/pdf/instances_and_images_guide/Red_Hat_OpenStack_Platform-11-Instances_and_Images_Guide-en-US.pdf (“Red Hat Open Stack”)
2026	Greg Zemlin, <i>Agentless vs. Agent-Based Security: Which is Better for the Cloud?</i> , Wiz (Nov. 26, 2023), https://www.wiz.io/academy/agentless-vs-agent-based-security (“Wiz Marketing”)
2027	Steve Lasker, <i>Key Differences Between VM and Container Vulnerability Scanning</i> , stevelaskerblog.com (June 27, 2018), https://stevelasker.blog/2018/06/27/key-differences-between-vm-and-container-vulnerability-scanning/
2028	RESERVED
2029	RESERVED
2030	RESERVED
2031	Exhibit B-1, Invalidity of United States Patent 11,663,032 (the “’032 Patent”) by Veselov, attached to Defendant Wiz, Inc.’s Initial Invalidity Contentions, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2032	Exhibit B-4, Invalidity of United States Patent 11,663,032 (the “’032 Patent”) by Price, attached to Defendant Wiz, Inc.’s Initial Invalidity Contentions, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2033	Exhibit B-2, Invalidity of United States Patent 11,663,032 (the “’032 Patent”) by Hufsmith, attached to Defendant Wiz, Inc.’s Initial Invalidity Contentions, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2034	RESERVED

Exhibit	Description
2035	RESERVED
2036	RESERVED
2037	RESERVED
2038	Appendix B, Invalidity of United States Patent 11,663,032 (the “032 Patent”), attached to Defendant Wiz, Inc.’s Initial Invalidity Contentions, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2039	RESERVED
2040	Stipulation and Order, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. June 25, 2024) (“Amended Scheduling Order”)
2041	Declaration of Christopher Henry In Response to Petitioner’s First Objections to Evidence [<i>served, not filed</i>]
2042	Declaration of Douglas E. Lumish Pursuant to 37 C.F.R. § 42.10(c)(2)
2043-2047	RESERVED
2048	Wiz, Inc.’s Answering Claim Construction Brief, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. Oct. 22, 2024) (excerpt) (“Answering Claim Constr. Chart”)
2049-2052	RESERVED
2053	Listing of Requested Documents
2054	RESERVED
2055	RESERVED
2056	Orca Security Ltd.’s Eleventh Supplemental Responses and Objections to Defendant Wiz’s First Set of Interrogatories, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. Dec. 13, 2024) (excerpts)

Exhibit	Description
2057	Stipulated Protective Order, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. Mar. 15, 2024), ECF No. 38
2058	Email exchange between counsel for Wiz, Inc. and counsel for Orca Security Ltd. (Dec. 17-26, 2024)
2059	Email exchange between counsel for Wiz, Inc. and counsel for Orca Security Ltd. (Dec. 23, 2024 – Feb. 25, 2025)
2060-2064	RESERVED
2065	<i>Orca Security Lands \$6.5M Seed Round to Deliver IT Security Teams Unprecedented Full Stack Cloud Visibility, Securing High-Velocity Cloud Growth</i> , Orca Security Blog (June 12, 2019), https://orca.security/resources/blog/orca-security-lands-6-5m-seed-round-to-deliver-it-security-teams-unprecedented-full-stack-cloud-visibility-securing-high-velocity-cloud-growth/
2066	Orca Security, <i>The Ultimate Guide to: Gaining Full Stack Visibility Into Your Cloud Assets</i> (Nov. 2019)
2067	Orca Security Technical Brief, <i>SideScanning™ – Inside the Engine that Powers Orca Security</i> (2020)
2068	Letter from counsel for Orca Security Ltd. to counsel for Wiz, Inc. (May 20, 2024), filed in <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. Sept. 10, 2024), ECF No. 140-2
2069	Letter to the Honorable Sherry R. Fallon from Rodger D. Smith Regarding Discovery Disputes, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. Oct. 9, 2024), ECF No. 165
2070	Francis & James Berthoty, <i>Redefining CNAPP: A Complete Guide to the Future of Cloud Security</i> , Software Analyst Cyber Research, (Sept. 12, 2024), https://softwareanalyst.substack.com/p/redefining-cnapp-a-complete-guide
2071	Memorandum Order, <i>Orca Sec. Ltd. v. Wiz, Inc.</i> , No. 1:23-cv-00758 (D. Del. Oct. 22, 2024), ECF No. 182

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2072	Declaration of Blake R. Davis Pursuant to 37 C.F.R. § 42.10(c)(2)
2073	Declaration of Dr. David Kaeli in Support of Patent Owner's Response ("Kaeli") [PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS]
2074	Declaration of Avi Shua ("Shua") [PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS]
2075	Wiz Experts Team, <i>Containers vs. VMs: What's the difference?</i> (Apr. 8, 2024) [Stavrou Dep. Ex. 2075]
2076	Francis & James Berthoty, <i>Redefining CNAPP: A Complete Guide To the Future of Cloud Security</i> (Sept. 12, 2024) [Stavrou Dep. Ex. 2076]
2077	Transcript of Deposition of Angelos Stavrou, Ph.D., taken March 5, 2025
2078	Video of <i>The CISO – Startup Connection Powered by YL Ventures – Orca Security</i> , https://www.youtube.com/watch?v=h4x4zh1D-tw (excerpt)
2079	Transcript of <i>The CISO – Startup Connection Powered by YL Ventures – Orca Security</i> , https://www.youtube.com/watch?v=h4x4zh1D-tw
2080	Video of <i>Full Stack Visibility In Minutes</i> , https://www.youtube.com/watch?v=sxD14bRT_28
2081	Transcript of <i>Full Stack Visibility In Minutes</i> , https://www.youtube.com/watch?v=sxD14bRT_28
2082	Video of <i>Orca Security – SideScanning vs Traditional Security Assessment Methods</i> , https://www.youtube.com/watch?v=0SDwFzINzGM
2083	Transcript of <i>Orca Security – SideScanning vs Traditional Security Assessment Methods</i> , https://www.youtube.com/watch?v=0SDwFzINzGM

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2084	<i>Australian Business Interview with Avi Shua Orca Security Through the Years</i> (last visited Mar. 19, 2025), https://www.youtube.com/watch?v=ne6biY89RyY
2085	Orca Security, <i>CNBC Interview with Avi Shua Orca Security Through the Years</i> (last visited Mar. 19, 2025), https://www.youtube.com/watch?v=r9aBmLHpSnY
2086	Orca Security, <i>The CUBE Interview: Avi Shua Explains Orca Security and Its Value Proposition</i> (last visited Mar. 19, 2025) https://www.youtube.com/watch?v=tlS0A92IYm8
2087	The Matias Experiment, <i>Ep398: Avi Shua CEO & Co-Founder, Orca Security</i> (last visited Mar. 19, 2025), https://www.youtube.com/watch?v=M58n3oE6E1Y
2088	Orca Security, <i>CNBC Prime Time Interview on Orca Security's \$550 Series C Extension Led by Temask</i> (last visited Mar. 19, 2025) https://orca.security/resources/video/cnbc-squawk-box-asia-avi-shua-interview-550m-series-c-extension/
2089	RESERVED
2090	Orca Security, <i>The Ultimate Guide to: Gaining Full Stack Visibility Into Your Cloud Assets</i> (June 2019)
2091	RESERVED
2092	Orca Security SideScanning Technical Brief, ORCA_0049504 (2021)
2093	Orca Security SideScanning Technical Brief (2022), ORCAW_CP010_000581130
2094	Video of <i>Orca Pod (In-Account) Onboarding</i> , https://www.youtube.com/watch?v=FEvqhAktFS0 (first made available May 1, 2020)

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2095	Video of <i>AWS Onboarding with Orca Security Orca Security and Its Partners</i> , https://www.youtube.com/watch?v=QdBsE2VqipU (first made available Apr. 21, 2020)
2096	<i>Create AWS Policy</i> (last visited Mar. 19, 2025), https://www.youtube.com/watch?v=OdtXqrvbEdU (first made available June 11, 2019)
2097	<i>Define AWS Role</i> (last visited Mar. 19, 2025), https://www.youtube.com/watch?v=SOw046Fnafo (first made available June 11, 2019)
2098	<i>GCP Onboarding, Walkthrough of How to Onboard a GCP Account for Orca to SideScan</i> (last visited Mar. 19, 2025), https://orca.security/resources/video/gcp-onboarding/ (first made available Apr. 21, 2020)
2099	<i>Orca Security-Deep Cloud Inspection</i> (last visited Mar. 19, 2025), https://www.youtube.com/watch?v=VwZ-7guGHw0
2100	<i>An MRI for Your Cloud Environment</i> (last visited Mar. 19, 2025), https://orca.security/resources/video/sidescanning-a-cloud-environment-mri/
2101	RESERVED
2102	Qualys, Inc., <i>Qualys Unveils Cloud Agent Platform for Continuous Asset Inventory, Security and Compliance</i> (Apr. 22, 2015), https://www.bankinfosecurity.com/press-releases/qualys-unveils-cloud-agent-platform-for-continuous-asset-p-223
2103	Saumitra Das, <i>Security Agents Don't Belong in Your Cloud!</i> (Aug. 18, 2021), https://cloudsecurityalliance.org/blog/2021/08/18/security-agents-don-t-belong-in-your-cloud
2104	Fortra, <i>Agent-Based vs. Agentless Scanning, Choosing the Right Vulnerability Scanning Method</i> (Aug. 27, 2021), https://www.fortra.com/blog/agent-based-vs-agent-less-scanning

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2105	RESERVED
2106	Keith Mokris, <i>How Agentless Approaches Sideline Cloud Workload Protection Strategies</i> (Feb. 23, 2021), https://web.archive.org/web/20210727053930/https://www.paloaltonetworks.com/blog/prisma-cloud/agentless-approaches-sideline-cloud-workload-protection/
2107	Orca Security, <i>Orca Security Lands \$6.5M Seed Round to Deliver IT Security Teams Unprecedented Full Stack Cloud Visibility, Securing High-Velocity Cloud Growth</i> (June 12, 219), https://orca.security/resources/blog/orca-security-lands-6-5m-seed-round-to-deliver-it-security-teams-unprecedented-full-stack-cloud-visibility-securing-high-velocity-cloud-growth/
2108	Orca Security, <i>Orca Security Lands \$20 Million Series A to Help More Global Enterprises Gain Deeper Multi-Cloud Visibility in Minutes, Not Months</i> (May 5, 2020), https://orca.security/resources/press-releases/orca-security-funding-20m-multi-cloud-visibility/
2109	TechCrunch, <i>Orca Security Raises \$20M Series A for Its Multi-Cloud Security Platform</i> (May 5, 2020), https://techcrunch.com/2020/05/05/orca-security-raises-20m-series-a-for-its-multi-cloud-security-platform/
2110	Orca Security, <i>Orca Security Lands \$55 Million Series B to Further Disrupt the Cloud Security Industry with Touchless, Deep, Context-Aware Security and Compliance</i> (Dec. 8, 2020), https://orca.security/resources/press-releases/iconiq-growth-orca-funding/
2111	Frederic Lardinois, <i>Orca Security Raises \$55M For Its Cloud-Native Security Platform</i> (Dec. 8, 2020), https://techcrunch.com/2020/12/08/orca-security-raises-55m-for-its-cloud-native-security-platform/

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2112	Michael Novinson, <i>Upstart Orca Security Raises \$210M in Google-Backed Funding</i> (Mar. 23, 2021), https://www.crn.com/news/security/upstart-orca-security-raises-210m-in-google-backed-funding
2113	Orca Security, <i>Orca Security Extends Series C Round to \$550M, Boosting Valuation to \$1.8 Billion, to Further Accelerate Transformation of Cloud Security Industry</i> (Oct. 5, 2021), https://orca.security/resources/press-releases/orca-security-series-c-550-million-announcement/
2114	RESERVED
2115	Ami Luttwak & Ryan Kazanciyan, <i>Securing Clouds, Securely</i> (Oct. 31, 2023), https://www.wiz.io/blog/the-wiz-approach-to-agentless-scanning
2116	Assaf Rappaport, <i>\$100M ARR in 18 Months: Wiz Becomes the Fastest-Growing Software Company Ever</i> (Aug. 10, 2022), https://www.wiz.io/blog/100m-arr-in-18-months-wiz-becomes-the-fastest-growing-software-company-ever
2117	RESERVED
2118	Katie Teitler & Edward Amoroso, Tag Cyber, <i>Vendor Landscape and TCO Analysis for Achieving Cloud-Wide, Workload-Deep Security and Compliance for Public Cloud Environments</i> , ORCA_0261399-415
2119	Mark Haranas, <i>The 20 Coolest Tech Startups of 2020</i> (Nov. 19, 2020), https://www.crn.com/slide-shows/cloud/the-20-coolest-tech-startups-of-2020
2120	Louis Columbus, <i>The Top 20 Cybersecurity Startups to Watch in 2021</i> (Nov. 29, 2020), https://www.forbes.com/sites/louiscolumbus/2020/11/29/the-top-20-cybersecurity-startups-to-watch-in-2021-based-on-crunchbase/

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2121	Orca Security, <i>Orca Security Named a 2021 Gartner Cool Vendor in Cloud Security Posture Management (CSPM)</i> (June 21, 2021), https://orca.security/resources/press-releases/press-release-cnapp-gartner-cool-vendor/
2122	Orca Security, <i>Orca Security Awarded 2022 Regional and Global AWS Partner Award</i> (Nov. 28, 2022), https://orca.security/resources/press-releases/orca-security-2022-regional-and-global-aws-partner-award/
2123	SC Media, <i>SC Award Winners 2023 Orca Security – Best Cloud Security Workload Protection Solution</i> (Aug. 21, 2023), https://www.scworld.com/news/sc-award-winners-2023-orca-security-best-cloud-workload-protection-solution
2124	Avi Shua, <i>Orca Security Wins SC Award for Best Cloud Security Posture Management (CSPM) Solution</i> (Aug. 31, 2022), https://orca.security/resources/blog/orca-security-winner-sc-award-cspm-solution/
2125	Gil Geron, <i>Orca Security Wins 2023 SC Award for Best Cloud Workload Protection Platform (CWPP)</i> (Aug. 21, 2023), https://orca.security/resources/blog/orca-security-wins-sc-media-award-best-cwpp-2023/
2126	RESERVED
2127	Forbes, <i>Orca Security</i> (last visited Mar. 19, 2025), https://www.forbes.com/companies/orca-security/?list=cloud100&sh=482e6ca468be
2128	Orca Security, <i>Orca Security Named 2023 Forbes Cloud 100</i> (Aug. 8, 2023), https://orca.security/resources/press-releases/orca-security-2023-forbes-cloud-100/
2129	Orca Security, <i>Orca Security Named to Inaugural Redpoint InfraRed 100 List</i> (July 17, 2023), https://orca.security/resources/press-releases/orca-security-named-to-inaugural-redpoint-infrared-100-list/

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2130	Orca Security, <i>Orca Security Named to Redpoint 2024 InfraRed 100 for Second Consecutive Year</i> (June 18, 2024), https://orca.security/resources/press-releases/orca-security-named-to-redpoint-2024-infrared-100-for-second-consecutive-year/
2131	<i>Rising in Cyber</i> , 2024 (last visited Mar. 19, 2025), https://risingincyber.com/
2132	Orca Security, <i>Orca Security Named to Notable Capital's Rising in Cyber 2024</i> (June 4, 2024), https://orca.security/resources/press-releases/orca-security-named-to-notable-capitals-rising-in-cyber-2024/
2133	Orca Security, <i>Orca Security: Deep Cloud Inspection</i> (last visited Mar. 19, 2025), https://orca.security/resources/product-info/sidescanning-deep-cloud-security-inspection-across-aws-azure-gcp/
2134	Vikki Davies, <i>The History of Cloud Computing</i> (Nov. 28, 2021), https://cybermagazine.com/cloud-security/history-cloud-computing
2135	Ankur Shah, <i>Palo Alto Networks Shifts Left with Prisma Cloud 3.0</i> (Nov. 16, 2021), https://www.paloaltonetworks.com/blog/2021/11/shift-left-with-prisma-cloud-3-0/
2136	Cybersecurity Insiders, <i>Cloud Security Report</i> (2018) https://static.carahsoft.com/concrete/files/5015/4532/6484/2018-cloud-security-report-palo-alto-networks.pdf
2137	Yuri Diogenes, <i>The Quest for Visibility and Control in the Cloud</i> , ISSA Journal (Mar. 20, 2019), https://issa.mydigitalpublication.com/articles/the-quest-for-visibility-and-control-in-the-cloud

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2138	Josh Dreyfuss, <i>Agents Are Not Enough: Why Cloud Security Needs Agentless Deep Scanning</i> (Sept. 28, 2021), https://www.wiz.io/blog/agents-are-not-enough-why-cloud-security-needs-agentless-deep-scanning
2139	Michael Novinson, <i>Orca Security Raises \$340M To Scale Platform R&D, Channel</i> (Oct. 5, 2021), https://www.crn.com/news/security/orca-security-raises-340m-to-scale-platform-r-d-channel
2140	Elias Terman, <i>From Stealthy Startup to Cloud Security Innovation Leader</i> (Feb. 4, 2021), https://orca.security/resources/blog/2020-recap/
2141	Kyle Wiggers, <i>Cloud Security Startup Wiz, Now Valued at \$10B, Raises \$300M</i> (Feb. 27, 2023), https://techcrunch.com/2023/02/27/cloud-security-startup-wiz-now-valued-at-10b-raises-300m/
2142	Rohan Goswami et al., <i>Wiz Walks Away from \$23 Billion Deal with Google, Will Pursue IPO</i> (July 22, 2024), https://www.cnbc.com/2024/07/23/google-wiz-deal-dead.html
2143	<i>SINET16 Previous Winners</i> (last visited Mar. 20, 2025), https://www.security-innovation.org/sinet16-award/past-award-winners/
2144	<i>SINET16 Innovator Award</i> (last visited Mar. 20, 2025), https://www.security-innovation.org/sinet16-award/
2145	<i>CISO Choice Award Winners 2020</i> (Nov. 19, 2020), https://securitycurrent.com/ciso-choice-awards-winners-2020/
2146	RESERVED
2147	Alan Schindel, <i>Detect and Prioritize CISA Known Exploited Vulnerabilities in the Cloud with Wiz</i> (Feb. 10, 2022), https://www.wiz.io/blog/detect-and-prioritize-cisa-known-exploited-vulnerabilities-kev-with-wiz

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2148	Chris Ray, <i>GigaOm Radar for Cloud Workload Security</i> (Jan. 15, 2025), https://gigaom.com/reprint/gigaom-radar-for-cloud-workload-security-241089-check-point/
2149	Provisional Patent Application No. 62/797,718
2150	<i>Azure Onboarding with Orca Security Orca Security and Its Partners</i> (last visited Mar. 23, 2025), https://www.youtube.com/watch?v=zw091YvbjsI
2151	U.S. Pat. App. Pub. No. 2020/0244692A1 A1
2152-2157	RESERVED
2158	Amazon Web Services, <i>Viewing Recent Management Events with the Console</i> (last visited Apr. 3, 2025), https://docs.aws.amazon.com/awscloudtrail/latest/userguide/view-cloudtrail-events-console.html
2159	Amazon Web Services, <i>Policies and Permissions in AWS Identity and Access Management</i> (last visited Apr. 3, 2025), https://docs.aws.amazon.com/IAM/latest/UserGuide/access_policies.html
2160	Alon Weiss & Jiong Liu, <i>Uncover What Is Really Deployed in Your Environment with the Enhanced Wiz Inventory</i> (Dec. 8, 2022), https://www.wiz.io/blog/uncover-what-is-deployed-in-your-environment-with-enhanced-wiz-inventory
2161	Joint Proposed Protective Order
2162	Redline Comparison between Joint Proposed Protective Order and Default Protective Order
2163	RESERVED
2164	RESERVED

Exhibit	Description
2165	Wiz Experts Team, <i>Vulnerability Scanning: How It Works, Why It Matters, and What You'll Find</i> (Sept. 30, 2024), https://www.wiz.io/academy/vulnerability-scanning
2166	Nicolas Ehrman, <i>Containerization 101: Transforming Application and Deployment</i> (Feb. 6, 2025), https://www.wiz.io/academy/containerization
2167-2168	RESERVED
2169	Declaration of Raghav Bajaj in Response to Petitioner's Third Objections to Evidence [PROTECTIVE ORDER MATERIAL] <i>[served, not filed]</i>
2170	Declaration of Nicole Elena Bruner Pursuant to 37 C.F.R. § 42.10(c)
2171-2299	RESERVED
2300	REDACTED [PROTECTIVE ORDER MATERIAL]
2301	REDACTED [PROTECTIVE ORDER MATERIAL]
2302	REDACTED [PROTECTIVE ORDER MATERIAL]
2303	REDACTED [PROTECTIVE ORDER MATERIAL]
2304	REDACTED [PROTECTIVE ORDER MATERIAL]
2305	RESERVED
2306	REDACTED [PROTECTIVE ORDER MATERIAL]

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2307	REDACTED [PROTECTIVE ORDER MATERIAL]
2308	REDACTED [PROTECTIVE ORDER MATERIAL]
2309	REDACTED [PROTECTIVE ORDER MATERIAL]
2310	RESERVED
2311	REDACTED [PROTECTIVE ORDER MATERIAL]
2312	REDACTED [PROTECTIVE ORDER MATERIAL]
2313-2399	RESERVED
2400	REDACTED [PROTECTIVE ORDER MATERIAL]
2401	REDACTED [PROTECTIVE ORDER MATERIAL]
2402	REDACTED [PROTECTIVE ORDER MATERIAL]
2403	REDACTED [PROTECTIVE ORDER MATERIAL]
2404	REDACTED [PROTECTIVE ORDER MATERIAL]
2405	REDACTED [PROTECTIVE ORDER MATERIAL]
2406	REDACTED [PROTECTIVE ORDER MATERIAL]

Exhibit	Description
2407	REDACTED [PROTECTIVE ORDER MATERIAL]
2408	REDACTED [PROTECTIVE ORDER MATERIAL]
2409	REDACTED [PROTECTIVE ORDER MATERIAL]
2410	REDACTED [PROTECTIVE ORDER MATERIAL]
2411	REDACTED [PROTECTIVE ORDER MATERIAL]
2412	REDACTED [PROTECTIVE ORDER MATERIAL]
2413	REDACTED [PROTECTIVE ORDER MATERIAL]
2414	REDACTED [PROTECTIVE ORDER MATERIAL]
2415	REDACTED [PROTECTIVE ORDER MATERIAL]
2416	REDACTED [PROTECTIVE ORDER MATERIAL]
2417	REDACTED [PROTECTIVE ORDER MATERIAL]
2418	REDACTED [PROTECTIVE ORDER MATERIAL]
2419	REDACTED [PROTECTIVE ORDER MATERIAL]

Exhibit	Description
2420	REDACTED [PROTECTIVE ORDER MATERIAL]
2421	REDACTED [PROTECTIVE ORDER MATERIAL]
2422	REDACTED [PROTECTIVE ORDER MATERIAL]
2423	RESERVED
2424	RESERVED
2425	REDACTED [PROTECTIVE ORDER MATERIAL]
2426	REDACTED [PROTECTIVE ORDER MATERIAL]
2427	REDACTED [PROTECTIVE ORDER MATERIAL]
2428	REDACTED [PROTECTIVE ORDER MATERIAL]
2429-2499	RESERVED
2500	Certificate of Accuracy of Transcription for Exhibit 2079 [<i>served, not filed</i>]
2501	Certificate of Accuracy of Transcription for Exhibit 2081 [<i>served, not filed</i>]
2502	Certificate of Accuracy of Transcription for Exhibit 2083 [<i>served, not filed</i>]
2503	Certificate of Accuracy of Transcription for Exhibit 2411 [<i>served, not filed</i>]

Exhibit	Description
2504	Certificate of Accuracy of Translation for Exhibits 2421 and 2425 [<i>served, not filed</i>]

I. RELIEF REQUESTED

Under 37 C.F.R. § 42.10(c) and the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 5), Patent Owner Orca Security Ltd. (“Patent Owner”) respectfully requests the *pro hac vice* admission of attorney Nicole Elena Bruner, Esq., in this proceeding. Patent Owner has conferred with counsel for Wiz, Inc. (“Petitioner”), and Petitioner does not oppose this motion.

II. LEGAL STANDARD

Under 37 C.F.R. § 42.10(c):

The Board may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

The Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper No. 5) further instructs:

The parties are advised that under 37 C.F.R. § 42.10(c), recognition of counsel *pro hac vice* requires a showing of good cause. The parties are authorized to file motions for *pro hac vice* admission under 37 C.F.R. § 42.10(c). Such motions shall be filed in accordance with the “Order -- Authorizing Motion for *Pro Hac Vice* Admission” in *Unified Patents, Inc. v. Parallel Iron, LLC*, No. IPR2013-00639, Paper No. 7 (P.T.A.B. Oct. 15, 2013), a copy of which is available on the Board Web site under “Representative Orders, Decisions, and Notices.”

Paper No. 5 at 2. The above referenced “Order -- Authorizing Motion for *Pro Hac Vice* Admission” further provides:

A motion for *pro hac vice* admission must:

- a. Contain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding.
- b. Be accompanied by an affidavit or declaration of the individual seeking to appear attesting to the following:
 - i. Membership in good standing of the Bar of at least one State or the District of Columbia;
 - ii. No suspensions or disbarments from practice before any court or administrative body;

- iii. No application for admission to practice before any court or administrative body ever denied;
- iv. No sanctions or contempt citations imposed by any court or administrative body;
- v. The individual seeking to appear has read and will comply with the Office Patent Trial Practice Guide and Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.;
- vi. The individual will be subject to the United States Patent and Trademark Office (USPTO) Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a);
- vii. All other proceedings before the Office for which the individual has applied to appear *pro hac vice* in the last (3) years; and
- viii. Familiarity with the subject matter at issue in the proceeding.

IPR2013-00639, Paper No. 7 at 3. As set forth below, and in the accompanying Declaration of Nicole Elena Bruner ("Bruner Decl.," Ex. 2170), each of these requirements is satisfied here.

III. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE NICOLE ELENA BRUNER ESQ. *PRO HAC VICE* IN THIS PROCEEDING

Ms. Bruner is a member in good standing of the District of Columbia (Bar No. 90005530) and admitted to practice before the United States Court of Appeals for the Federal Circuit. Bruner Decl. ¶ 2. Ms. Bruner has never been suspended or disbarred from practice before any court or administrative body. *Id.* ¶ 3. No application of Ms. Bruner for admission to practice before any court or administrative body has ever been denied. *Id.* Nor has any court or administrative body imposed sanctions or contempt citations against Ms. Bruner. *Id.* Ms. Bruner has read, fully understands, and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of title 37 of the Code of Federal Regulations. *Id.* ¶ 4. Ms. Bruner acknowledges and agrees that she will be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). *Id.*

Patent Owner's lead counsel in this proceeding, Christopher Henry, is a registered practitioner (Reg. No. 60,907). Moreover, as set forth below (and in her accompanying declaration), Ms. Bruner is both an experienced and technically-trained litigation attorney with an established familiarity with the subject matter at issue in this proceeding.

Ms. Bruner received a Bachelor of Science degree in Industrial & Systems Engineering from Virginia Polytechnic Institute and State University (Virginia Tech) in 2022. Bruner Decl. ¶ 5. Ms. Bruner earned a law degree from American University Washington College of Law in 2022. *Id.* Ms. Bruner joined Latham & Watkins LLP (“Latham”) as an associate in 2022. *See id.* ¶ 6.

Ms. Bruner is currently a member of Latham’s intellectual property group, with a focus on patent litigation. *Id.* Ms. Bruner has practiced in this group for almost three years. *Id.*

Ms. Bruner also has an established familiarity with the subject matter at issue in this proceeding. Ms. Bruner has been actively involved in the related district court litigation between the Petitioner and Patent Owner, *Orca Security Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. July 12, 2023). *Id.* ¶ 7. U.S. Patent No. 11,663,032 (“’032 patent”), which is at issue in this proceeding, is one of the patents asserted by the Patent Owner in the district court litigation. *Id.* ¶ 8. Ms. Bruner has been actively involved in Patent Owner’s factual investigation and development of its claim construction, validity, and infringement positions regarding the claims of the ’032 patent at issue here. *Id.*

Ms. Bruner has been actively involved in analyzing and assisting with responding to the Petition for *Inter Partes* Review submitted in this proceeding. *Id.* ¶ 9.

She is concurrently applying to appear *pro hac vice* in the following proceeding before the USPTO: Case Nos. IPR2024-00863, IPR2024-00865, IPR2024-01109, IPR2024-01190, and IPR2024-01191. *Id.* ¶ 10.

In view of Ms. Bruner's extensive knowledge of the subject matter at issue in this proceeding, and in view of the interrelatedness of this proceeding and the related district court litigation, Patent Owner has a substantial need for Ms. Bruner's *pro hac vice* admission and her involvement in the continued prosecution of this proceeding. In addition, admission of Ms. Bruner *pro hac vice* will enable Patent Owner's to avoid unnecessary expense and duplication of work between this proceeding and the district court litigation. *See* 77 Fed. Reg. 48,612, 48,661 (Aug. 14, 2012) (Office's comment on final rule discussing concerns about efficiency and costs where an entity has already engaged counsel for parallel litigation).

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that Ms. Bruner be admitted *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: July 3, 2025

By: / Raghav Bajaj /

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*Counsel for Patent Owner
Orca Security Ltd.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 3rd day of July, 2025, a true and correct copy of the foregoing **Patent Owner's Unopposed Motion for *Pro Hac Vice* Admission of Nicole Elena Bruner Under 37 C.F.R. § 42.10(c) and Exhibit 2170** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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