

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Filed on behalf of: Wiz, Inc.

By: Matthew A. Argenti (margenti@wsgr.com)
Michael T. Rosato (mrosato@wsgr.com)
Wesley E. Derryberry (wderryberry@wsgr.com)
Joseph M. Baillargeon (jbaillargeon@wsgr.com)
WILSON SONSINI GOODRICH & ROSATI

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 No. 11,663,032

PETITIONER’S REPLY TO PATENT OWNER’S RESPONSE

TABLE OF CONTENTS

	<u>Page</u>
I. Introduction.....	1
II. Claim Construction.....	1
A. “location”	1
B. “analyzing the snapshot”	1
III. Ground 1	2
A. PO’s Attack on the Combination Fails.....	3
B. The Combination Satisfies the Claims.....	6
1. Element 1.5	6
2. Element 1.7	7
3. Claims 2-5.....	9
4. Claims 16/20	10
IV. Ground 2	13
V. Secondary Considerations	14
A. PO Does Not Prove Entitlement to a Presumption of Nexus.....	15
B. PO’s Evidence Falls Short.....	17
1. Long-felt Need	18
2. Skepticism.....	20
3. Praise	21
4. Copying.....	23
5. Commercial Success	27
VI. Conclusion	29
VII. Certificate of Compliance.....	30
VIII. Appendix–Petitioner’s Updated Exhibit List	31

I. INTRODUCTION

Patent Owner (“PO”) fails to rebut the petition’s obviousness showing. With little to add beyond flawed pre-institution arguments, PO turns to secondary considerations. The centerpiece is a false copying story in which PO takes credit for Wiz’s extraordinary success. But the record shows that Wiz’s industry-changing achievements were driven by the team’s deep expertise and sustained innovation, not copying. PO’s other secondary-considerations arguments similarly fail to withstand scrutiny.

II. CLAIM CONSTRUCTION

A. “location”

PO does not dispute Wiz’s construction. Paper 32 (“POR”), 7-9. Moreover, PO’s expansive view of “location” as encompassing an identifier reinforces Wiz’s obviousness arguments. *Id.*, 36, 54; EX1402, 143:6-144:17 (snapshotId is “unique identifier and therefore you can consider it to be the location of the snapshot”); EX1400, ¶9.

B. “analyzing the snapshot”

PO’s argument that the claims exclude Veselov’s instantiated assessment-VM approach is contradictory and irrelevant. POR, 7-9.

PO’s argument has numerous contradictions. PO does not explain contrary positions in its district-court complaint (Pet., 10; EX1006, 23, 57-58), claim-

construction briefing (EX1117, 64 (“indirect analysis” of snapshot), 67-68 (POPR assertion not limiting)), and the specification/provisional (EX1001, 7:37-52; EX2149, 7-8 (¶22), 11 (¶43)). Dr. Kaeli testified that the specification identifies analyzing an instantiated VM as an example of analyzing the snapshot. EX1401, 33:12-36:11; *see also* EX1402, 215:5-222:7 (refusing to address). PO argues that a document describing “examin[ing] the VMs spun up from the snapshot” shows Wiz practicing this limitation. POR, 54-55 (citing EX2026, 2-3); *see also* EX1401, 30:15-31:17 (“spinning up” VM “interchangeable” with instantiating), 127:7-131:8 (evasive regarding EX2026, 3). When asked to explain his opinion that Wiz analyzes snapshots as recited without evidence of how Wiz actually performs the analysis, Mr. Shua filibustered. EX1402, 187:2-203:14; *see also id.*, 249:11-258:2 (refusing to address contradictory position on Veselov’s 5A embodiment).

Regardless, the petition does not depend on the assessment-VM approach. Pet., 40-45; EX1400, ¶10. Thus, mooting PO’s claim-construction argument.

III. GROUND 1

PO repeats pre-institution rationale and claim-mapping arguments. They still fall short.

A. PO’s Attack on the Combination Fails

Though labeled as seven different points, PO’s arguments share the same fundamental flaws. PO repeatedly emphasizes superficial differences between the references, makes flawed teach-away arguments, and misapplies the law of obviousness.

PO attempts to drive a wedge between Veselov and Hufsmith but never moves beyond superficial semantics. PO argues Hufsmith does not mention “snapshots” or “volumes” like Veselov (POR, 13) but ignores the petition’s straightforward rationale for applying Hufsmith’s techniques to snapshot analysis. Pet., 20-23. PO argues that container/VM “images” are not analogous to “snapshots, i.e., **volume** images” (POR, 13-14), but identifies no distinction relevant to the combination. Nor could it have since the relevant underlying data—e.g., files, applications, etc.—is equivalent. EX1400, ¶¶11-14 (citing EX1040, ¶43; EX1129, 2:28-48). Indeed, the machine-image resource in many major platforms typically just consists of one or more snapshots plus metadata. EX1400, ¶15 (citing EX1121; EX1131; EX1132). PO argues that Hufsmith’s teachings are limited to a pre-deployment, development context (POR, 15-17), but a POSA would not have viewed Hufsmith’s teachings as having such narrow applicability. EX1400, ¶¶16-19; EX1078, ¶108 (applicable during development “and deployment”), 154.

PO’s response to the demonstrated benefits of prioritized alerts is unconvincing. PO claims EX2075 states that “containers are ‘less secure’ than VMs” (POR, 14-15), but the selectively quoted statement actually compares different container configurations. EX2075, 6. Regardless, Hufsmith teaches applicability to both containers and VMs. EX1400, ¶20; EX1078, ¶¶3, 26, 49, 52, 149, 159 (noting “similar approaches are contemplated for virtual machines”). PO claims Veselov’s results can be evaluated “without issue” (POR, 15-16), but Veselov gives no indication that prioritization would not be beneficial, and motivation does not require a reference to criticize itself. EX1400, ¶20; *Janssen Pharms., Inc. v. Teva Pharms. USA, Inc.*, 97 F.4th 915, 929-30 (Fed. Cir. 2024).

PO’s teach-away argument falls flat. PO argues that Hufsmith uses multiple scanning applications, which is contrary to Veselov’s supposed disparagement of complexity. POR, 16-17. But even if the combination required distinct scanning applications—and it does not—Veselov expressly teaches performing multiple types of assessments. EX1007, 2:35-41; EX1400, ¶21. PO also misreads Veselov’s complexity comment, which merely recognizes that snapshot-based scans avoid installation/monitoring of agents inside targets. EX1007, 2:42-46; EX1400, ¶21.

Wiz showed that arriving at the claims merely involved using known elements according to their known function to achieve predictable results. Pet., 20-

22 (citing *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 416-17 (2007)). PO’s conclusory denial does not substantively dispute this point. POR, 17. PO alleges a gap between these concepts being well-known and beneficially applied to Veselov (*id.*), but as discussed above, PO fails to rebut the demonstrated benefits. PO treats corroboration of the applied teachings’ routine, predictable nature as indicative of hindsight (*id.*), which is contrary to *KSR*. 550 U.S. at 416.

PO also fails to rebut reasonable expectation of success. PO claims Wiz failed to show a POSA would have expected to “garner sufficient information from a snapshot to facilitate any type of application usage determination.” POR, 17-18. But this ignores Wiz’s showing here and for claims 3-5, which address specific aspects of snapshots providing such information. Pet., 20-23, 39, 45-48; EX1002, ¶¶101, 105, 154, 172-79. PO also identifies no support for its assertion. PO cites Dr. Kaeli, but his reasonable-expectation-of-success point, a flawed bodily-incorporation argument, has nothing to do with application-usage determinations. EX2073, ¶90 (alleging lack of success applying source-code annotations to Veselov because it lacks source code); EX1400, ¶¶19, 22-23. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

B. The Combination Satisfies the Claims

1. Element 1.5

PO concedes Hufsmith discloses determining whether application components/files/code are active/dormant, but PO claims these are not applications and that they are not “used” because Hufsmith is supposedly limited to pre-deployment scenarios. POR, 19-21. This attacks the references individually and misreads Hufsmith.

PO’s attack on Hufsmith individually lacks merit. *Palo Alto Networks, Inc. v. Centripetal Networks, LLC*, 122 F.4th 1378, 1386 (Fed. Cir. 2024). Even if Hufsmith itself were as limited as PO claims—and it is not, as explained below—the petition applies Hufsmith’s teachings in combination with Veselov to determine whether the installed applications detected during Veselov’s snapshot analysis are used. Pet., 39. PO thus fails to address the combined teachings.

Regardless, PO misreads Hufsmith. Hufsmith’s “distributed application” refers to the workload of a distributed service, which routinely included multiple installed applications. Pet., 38; EX1002, ¶¶92, 152; EX1400, ¶¶24-26. Hufsmith broadly describes application components as “one or more executing bodies of

code,” refuting PO’s narrow characterization. EX1078, ¶¶3-4, 33-34 (evaluating “packages, binaries, and other resources”), 40-42, 104-05, 115; EX1400, ¶¶27-29. Moreover, Hufsmith is not limited to pre-deployment assessments. EX1078, ¶¶108 (applicability during development “and deployment”), 140 (use determination based on “[e]xecution environment records”); EX1400, ¶30. Regardless, POSAs would have recognized the applicability of Hufsmith’s teachings to deployed assets since this type of application-use determinations/prioritization was well-known in that context. EX1002, ¶¶68, 101, 104, 154, 157, 162; EX1400, ¶¶19, 30.

2. Element 1.7

Wiz demonstrated the combination’s teaching of reporting vulnerabilities as “prioritized alerts according to the use determinations.” Pet., 41-43. PO responds with mischaracterization and deflection.

PO’s assertion that Veselov does not teach alerts is conclusory and wrong. POR, 22 (citing Kaeli, ¶¶103-106). Verbatim use of claim terms is not required, and Veselov does not merely describe reporting results generally. Pet., 41-42; EX1007, 10:17-36 (results sent “in a user-readable format ... to be displayed on the user device” and may identify remediation), 20:57-21:13, 23:19-47; EX1400, ¶¶31-32; *see also* EX1401, 95:3-108:12 (Dr. Kaeli unable to identify content requirement for “alert”).

PO’s attack on Hufsmith’s overall score is a strawman. POR, 23. Wiz did not map prioritized alerts to the overall score itself. Rather, Wiz showed that Hufsmith teaches/suggests reporting an overall score “and information about individual vulnerabilities” such as use-determination-based priorities. Pet., 42; EX1078, ¶¶31-33, 36, 96; EX1002, ¶162; EX1400, ¶¶33-35.

PO’s arguments against Hufsmith’s annotation teachings are similarly misguided. PO argues that Hufsmith’s source-code annotations are inapplicable because Veselov involves read-only snapshots, not source code. POR, 23-24. But Wiz did not propose bodily incorporation of source-code annotations, nor is that the test. Pet., 20-23; EX1002, ¶¶103-05; *In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012). PO also ignores Hufsmith’s express disclosure of these teachings’ broader applicability. Pet., 42-43; EX1078, ¶¶108, 154; EX1400, ¶36.

PO’s secondary-considerations argument falls flat. PO claims its evidence shows “prioritized alerts” in combination with other elements were praised and copied. POR, 23. But this argument is not commensurate with the claims, which recite application-usage-based prioritization, not prioritized alerts generally. *In re Huai-Hung Kao*, 639 F.3d 1057, 1068 (Fed. Cir. 2011) (evidence “must be reasonably commensurate” with claims’ scope). Regardless, as explained below, PO identifies no evidence indicating that this was nonobvious (*infra*, §V), and

ignores extensive evidence showing the opposite. Pet., 20-21; EX1002, ¶¶65-68, 101, 104-05; EX1400, ¶¶19, 76-77.

3. Claims 2-5

Claims 2-5 recite additional limitations involving use determinations. For claims 2-3, PO relies on its flawed independent-claim arguments. POR, 25-26; *supra*, §III.B.1. For claims 4-5, PO resorts to strawmen, mischaracterization, and bodily-incorporation arguments.

PO’s arguments for claim 4 (verifying access times to files) are unconvincing. PO mischaracterizes the petition as merely arguing obviousness based on background references. POR, 26-27. Wiz actually showed that Hufsmith teaches application-usage determinations based on execution-environment records and that a POSA would have known that such records—including the recited access times—were routinely and predictably used to perform the application-usage techniques taught by Hufsmith. Pet., 46-47; EX1002, ¶¶175-76. PO alleges a gap between the teachings being well known and beneficially applied (POR, 27) but ignores discussion of the benefits. Pet., 22-23, 48. PO again claims Hufsmith is limited to pre-deployment container images (POR, 27), which mischaracterizes Hufsmith and attacks the references individually. *Supra*, §III.A; EX1078, ¶108; EX1400, ¶¶22, 37-41.

PO’s discussion of claim 5 (analyzing application/system logs) is similarly flawed. PO mischaracterizes the petition as merely arguing that application/system logs were routinely kept and analyzed. POR, 27. In reality, Wiz showed that a POSA would have understood such logs to be routine parts of the execution-environment records Hufsmith uses to determine application usage. Pet., 47-48; EX1002, ¶¶178-80. PO also rehashes its flawed teach-away argument, citing Veselov’s supposed criticism of complexity. POR, 27. This mischaracterizes Veselov, as discussed above, and ignores the undisputed benefits. *Supra*, §III.A; Pet., 22-23; EX1400, ¶¶42-43.

4. Claims 16/20

Wiz showed that a POSA would have understood the disclosed process in Veselov to include, or at least suggest, the recited querying of the cloud management console (“CMC”) “for the location of the snapshot and the location of the virtual disk.” Pet., 63-68. In response, PO deflects.

PO begins with mischaracterization and red herrings. PO claims Wiz admitted the 5A/B embodiments do not involve a “cloud” provider (POR, 28), but Wiz showed the opposite. Pet., 25 (cloud), 63 (Fig. 1 setting applies to other embodiments), 64 (5A/B user device and environment have same implementation/interactions as 3A/B); EX1002, ¶¶91, 227-29. PO says the limitation is “neither necessary nor inherent” because Veselov says the snapshot

can be “obtained.” POR, 28. But Wiz did not rely on inherency, and PO does not respond to Wiz’s explanation of what a POSA would have understood Veselov’s process to involve/suggest. Pet., 63-68; EX1400, ¶¶44-48, 54.

PO’s arguments addressing “virtual disk” location aspect are equally flawed. The petition presented several independent arguments for this aspect: (1) the previously discussed querying for the snapshot’s location satisfies this because Veselov teaches/suggests a snapshot and virtual disk having the same general location, (2) Veselov teaches/suggests querying the virtual-disk location as part of the assessment configuration (e.g., selecting a particular virtual disk for the snapshot), and (3) it was obvious as part of the mitigation process. Pet., 66-68. PO’s scattershot response is unconvincing.

PO again resorts to mischaracterization. PO claims Wiz conceded that Veselov lacks virtual-disk-location queries (POR, 28), but Wiz showed the opposite. Pet., 66-67. PO claims Wiz argued that such querying was obvious simply because the user’s initial request can identify a target VM (POR, 28-29), but Wiz’s discussion of the scan request was just the starting point of the analysis. Pet., 63-67. PO claims the user’s ability to identify the VM in the request means that the user already knows the VM location and components. POR, 29. But PO does not explain this non sequitur, which conflates the VM’s identity with the

virtual disk’s location. Regardless, VM identification in the request is optional. EX1007, 6:34-38; EX1400, ¶¶49-53.

PO continues attacking inherency strawmen. PO claims Wiz’s first point (involving the snapshot’s/disk’s general location) is inherency because it supposedly relies “exclusively” on figures. POR, 29-30. But Wiz cited other evidence and explained what Veselov suggests to a POSA. Pet., 67 (citing, *inter alia*, EX1002, ¶232; Pet., 60-61). PO argues that snapshots in Figure 1 are located in a separate storage service and that the snapshots in other figures are read by a hypervisor. POR, 30. But the storage service is optional (EX1007, 5:1-22), and hypervisor involvement does not address, let alone rebut, Wiz’s point. EX1400, ¶¶47, 50.

PO similarly argues that locating a VM does not necessarily/inherently locate a virtual disk because VMs and virtual disks are not synonymous and “typically” have different locations. POR, 29. But Wiz did not rely on inherency or on VMs/disks being synonymous. Pet., 66-67. Regardless, to the extent PO is referring to general storage locations, the cited evidence does not show that these are typically different. EX1400, ¶¶51-55 (citing EX1133).

PO’s “could vs. would” arguments are also strawmen. PO argues that the commonplace nature of location queries and Veselov’s ability to identify the virtual disk only show that a POSA could have modified Veselov. POR, 29, 30-

31. But the petition did not rely on a modification. Rather, it explained why a POSA would have understood Veselov’s disclosed process as involving/suggesting the recited querying. Pet., 66-67; *Janssen*, 97 F.4th at 928 (references read from POSA’s perspective for all they fairly suggest).

Lastly, PO’s secondary-consideration arguments fall flat. PO says disk-locating was commercially important because it enables efficient scanning. POR, 31. But as explained further below, PO does not prove commercial success or nexus for the independent claims, let alone claims 16/20. *Infra*, §§V.A, V.B.5; EX1400, ¶¶116-19. Nor does PO explain any connection between the allegedly queried location—[REDACTED] (EX2074, ¶¶78-79)—and the more general location within the cloud infrastructure that PO emphasizes here for commercial success. PO alleges copying but does not explain (nor could it) how the cited document shows this, let alone nexus to claims 16/20. EX1400, ¶¶100-115; *see also infra*, §§V.A, V.B.4.

IV. GROUND 2

Beyond cursory reference to its claim-mapping and secondary-considerations arguments for claim 1, PO’s only response to Ground 2 is an attack on the Hutchins combination that consists of strawmen and red herrings. PO claims Hutchins’ snapshot-based techniques are fundamentally different from Hufsmith’s container-image analysis. POR, 62-63. This distinction is flawed

(*supra*, §III.A), but regardless, the combination applies Hutchins’ teachings to assessments of snapshots, not container images. Pet., 70-72; EX1400, ¶¶56-57. PO claims Veselov lacks the resources to perform virus scans. POR, 62. But even if the combination required bodily incorporation of Hutchins’ analysis—and it does not—PO’s assertion is unsupported and contrary to a POSA’s understanding of Veselov. EX1400, ¶58 (citing EX1129, 2:28-48, 7:47-62). PO argues that Hutchins analyzes instantiated VMs, not snapshots (POR, 62-63) but this again assumes bodily incorporation of Hutchins’ analysis step and attacks the references individually. PO accuses Wiz of hindsight (POR, 63) but never addresses the petition’s rationale for applying Hutchins’ teaching of a well-known, beneficial mitigation technique to snapshot-based assessments. Pet., 70-72.

V. SECONDARY CONSIDERATIONS

PO’s secondary-considerations arguments fail at every level. For evidence to receive meaningful weight, patentees must prove nexus to the claims. *Fox Factory, Inc. v. SRAM, LLC*, 944 F.3d 1366, 1373-74 (Fed. Cir. 2019). Absent entitlement to a presumption of nexus—which PO does not allege—patentees must prove secondary considerations are the “direct result” of the claims’ “unique characteristics.” *Id.*; *Janssen*, 97 F.4th at 935 (consideration must result from something “both claimed and *novel*”); *Yita LLC v. MacNeil IP LLC*, 69 F.4th 1356, 1364 (Fed. Cir. 2023), *cert. denied*, 144 S. Ct. 499 (2023) (considerations tied to

known features lack nexus). Even with the presumption, it is rebutted by showing that evidence relates to unclaimed or known features. *Ormco Corp. v. Align Tech., Inc.*, 463 F.3d 1299, 1312 (Fed. Cir. 2006).

A. PO Does Not Prove Entitlement to a Presumption of Nexus

To establish a nexus presumption, patentees must prove the product (1) embodies the claims and (2) is coextensive with the claims. *Fox Factory*, 944 F.3d at 1373-74. Even if the Board were to credit PO’s assertion of “practicing” the claims as a veiled presumption argument, PO does not satisfy its burden.

The presumption question is open and shut since PO never addresses coextensiveness. POR, 36-39; *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, Paper 33, 33 (precedential) (no presumption where patentee did not provide coextensiveness analysis).

Nor could PO have proven coextensiveness. Significant unrecited features undercut coextensiveness. *Fox Factory*, 944 F.3d at 1374-75; *SightSound Technologies, LLC v. Apple Inc.*, 809 F.3d 1307 (Fed. Cir. 2015). The claims focus on a single VM’s virtual disk, yet PO emphasizes automatically enumerating “every asset” in the “control plane path.” EX2067, 8-9; *see also* EX1402, 37:3-14

[REDACTED] 42:20-45:10 [REDACTED]

47:19-49:9 [REDACTED] 55:15-57:18 [REDACTED]

[REDACTED], 70:10-72:13 [REDACTED] 90:22-91:6

[REDACTED] The claims detect “vulnerabilities,” yet in [REDACTED]
[REDACTED] EX2067, 9-
10; EX1402, 76:7-77:10 [REDACTED] EX1400, ¶¶59-68;
see also EX2300, 11.

The abundance of significant unrecited features is confirmed by PO’s
[REDACTED]
[REDACTED]. POR, 36-38 (citing
EX2300); *see also* EX1402, 102:2-106:17; EX1401, 56:15-57:6 (unaware of all
platform features).

Coextensiveness is further undercut by PO’s use of largely the same
evidence for claims in other patents that lack supposedly critical features of
the ’032 patent and that include purportedly significant features not recited here.
Fox Factory, 944 F.3d at 1375-78 (no coextensiveness if critical unrecited feature
claimed in different patent); IPR2024-00863, Paper 32, 35-62 (cloud-API-based
disk identification/locating); IPR2024-00865, Paper 32 (“685-POR”), 34-62
(sensitive-data detection/filtering/prioritizing); IPR2024-01109, Paper 30, 30-67
(network-location correlation/prioritization); IPR2024-01190, Paper 28, 33-62
(data-based threat detection/prioritization); IPR2024-01191, Paper 29, 33-65 (asset
risk determination/prioritization).

PO also fails its burden for the “embodiment” requirement. PO provides no analysis for elements 1.5-1.7/9.5-9.8/16.5-16.8 and a single sentence for dependent claims. POR, 38; *Volvo Penta of the Americas, LLC v. Brunswick Corp.*, 81 F.4th 1202, 1211 (Fed. Cir. 2023) (conclusory arguments insufficient). The outsourced discussion is improper (37 C.F.R. §42.6(a)(3)), but falls short regardless. Mr. Shua

[REDACTED]

EX2074, ¶40. He provided no meaningful clarity during cross-examination.

EX1402, 143:6-144:17 [REDACTED]

[REDACTED] His testimony for element 1.5 is just as conclusory as the POR. EX2074, ¶¶51-52. For element 1.6, he relies on

[REDACTED]. EX2074, ¶54; EX2300, 14

[REDACTED]

Yet PO elsewhere argues that the specification’s listing of threats “that do not represent vulnerabilities” excludes those threats—which include startup services—from the recited “vulnerabilities.” 685-POR, 28; IPR2024-00865, EX2074, ¶165; EX1001, 6:21-32; EX1400, ¶69.

B. PO’s Evidence Falls Short

Each alleged secondary consideration has similar shortcomings (discussed for each category below). Most of PO’s arguments address its supposedly “patent-practicing” product generally, which is insufficient. *Ancora Techs., Inc. v. Roku*

Inc., No. 23-1674, slip op. at 14-15 (Fed. Cir. June 16, 2025) (praise tied to “products using the patent” lacked nexus to claims); *supra*, §VI.A. Regardless, the evidence relates exclusively to unrecited and/or known features. Most evidence merely addresses “agentless” scanning, yet PO does not show this is recited. Even if it had, extensive evidence demonstrates that it was known. *E.g.*, EX1002, ¶¶57, 88-89; EX1040, Abstract, ¶¶8-12, 23, 43-48, 52; EX1073, 1; EX1400, ¶¶70-71.

PO says [REDACTED]
[REDACTED] (POR, 6, 38, 41, 44-46, 59-61), but cloud-API-based agentless scanning was also known. EX1400, ¶72 (citing EX1020, 21:9-43; EX1053, ¶¶79-94). PO emphasizes [REDACTED]
[REDACTED]. EX1400, ¶¶73-74 (citing EX1122, 20, 164-65, 166; EX1123, 3, 9, 10-12; EX1124); EX1401, 121:7-126:8 (used by students). PO also touts unrecited features, relies on self-interested statements, and mischaracterizes the record.

1. Long-felt Need

PO does not prove long-felt need, let alone one the claims solved. PO alleges a vague need for “unobtrusive, comprehensive” cloud security (POR, 33-36), but its arguments fall flat.

PO’s emphasizes agents’ limitations, but the alleged solution—agentless scanning—was known. POR, 34-36 (citing EX1001, 2:16-17; EX2076, 11;

EX2103, 2; Ex.2136, 2); *Newell Companies, Inc. v. Kenney Mfg. Co.*, 864 F.2d 757, 768 (Fed. Cir. 1988) (no solution to long-felt need if “another supplied the key element”); EX1400, ¶¶71, 82-83. There is little daylight between the touted features and Veselov. EX1400, ¶¶71-77, 81-84; *Geo. M. Martin Co. v. Alliance Mach. Sys. Int’l, LLC*, 618 F.3d 1294, 1304 (Fed. Cir. 2010) (when differences between art/claims are “minimal...it cannot be said that any long-felt need was unsolved”).

PO’s evidence has other flaws. High-level comments about “security” are not commensurate with the claims. EX1029, 1; EX2136, 2. Self-interested statements are insufficient. POR, 33-35 (citing Shua, ¶¶84-94; EX1001; EX2082-2083; EX2099-2100); EX1402, 259:2-260:12 [REDACTED]; *Bayer Healthcare Pharms., Inc. v. Watson Pharms., Inc.*, 713 F.3d 1369, 1377 (Fed. Cir. 2013). Regardless, Mr. Shua inadvertently refutes long-felt need. Shua, ¶¶90-91 (companies “disagreed” that network/agent-based scanners were inadequate). Mr. Shua also admits that agent-based scanners were able to determine used applications, and the record shows that application-usage determination/prioritization was known for agent-based and agentless techniques alike. EX1002, ¶¶68, 150-63; EX2074, ¶81; EX2083, 1 (agents “can have full visibility to anything that is running on them”).

PO also fails to prove that it *solved* the alleged need. *Perfect Web Techs., Inc. v. InfoUSA, Inc.*, 587 F.3d 1324, 1332 (Fed. Cir. 2009). PO offers no analysis and cites self-interested testimony. POR, 35-36 (citing Shua, ¶¶13-14, 93-94). PO’s own evidence refutes its assertion. EX2102, 1-2 (competitor “resolve[d]” issues with agents/network scanners in 2015); EX2076, 10 (agentless “severely limited”), 12-13 (agentless “doesn’t fit the containerized world well” and such solutions have “matur[ed] into agent based ones”), 23 (market recognizes “pitfalls of a pure agentless approach”); EX1400, ¶¶85-86. PO also obscures a statement in EX2076 that companies who “once championed agentless solutions are now all building agents.” *Compare* EX1125, 2 *with* EX2076, 2. Mr. Shua admits that [REDACTED]. EX1402, 128:16-129:19.

2. Skepticism

PO does not prove skepticism with nexus. Most evidence relates exclusively to “agentless” scanning, but this unrecited aspect was known. POR, 39-31; EX2076, 7-8; EX2106, 1; [REDACTED] EX1400, ¶¶71, 87-91.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. *Auris Health, Inc. v. Intuitive Surgical Operations, Inc.*, 32 F.4th 1154,

1159 (Fed. Cir. 2022) (skepticism “must be specific to the invention”). Dr. Kaeli’s conclusory assertion (Kaeli, ¶¶147-51), and Mr. Shua’s self-interested testimony are equally unhelpful. Shua, ¶¶95-97.

3. Praise

The “praise” evidence largely consists of self-interested statements, which are not relevant praise. *Bayer*, 713 F.3d at 1377. Many documents are PO’s own press releases (EX2121-2122; EX2124-2125; EX2128-2130; EX2132) while others quote self-interested statements from PO or investors/partners. EX2117; EX2123. PO failed to disclose that several so-called “awards” were sponsored by PO’s investors and that PO commissioned the TAG Security Report (EX2118). EX1402, 173:7-184:1; EX1400, ¶¶92-94 (citing EX2129-2131; EX2143-2145). Indeed, given the number of undisclosed relationships Wiz discovered, it is difficult to know how pervasive the problem is.

Regardless, PO’s awards discussion is irrelevant absent connection to the claims. *Bosch Auto. Serv. Sols., LLC v. Matal*, 878 F.3d 1027 (Fed. Cir. 2017). PO does not establish a nexus presumption (*supra*, §V.A), and PO’s conclusory assertion of a connection does not satisfy its burden. POR, 45-46; EX1400, ¶¶95-96. Quoted statements relate exclusively to known/unrecited features such as the “agentless approach” (EX2123, 1-2; EX2124, 1) and scanning “every discovered asset” (EX2119, 6-7). EX1400, ¶¶71, 96; *supra*, §§V.A, V.B.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *E.g.*, EX1007, 2:27-41 (block-level assessment, configuration assessment), 3:29-4:4 (block-level image, snapshot-based results comparable to target scan), 5:1-5 (APIs); EX1400, ¶¶71-75, 81 [REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO’s additional evidence is equally unconvincing. POR, 45-46. PO’s 2024 article is not an “industry” statement. *Cf. Ingenico Inc. v. IOENGINE, LLC*, IPR2019-00929, Paper 53, 100-01 (article hearsay personal opinion, not industry praise). Regardless, being first to commercialize a known idea is “not probative” of nonobviousness. *Novartis AG v. Torrent Pharmaceuticals Ltd.*, 853 F.3d 1316, 1330-31 (Fed. Cir. 2017); EX2076, 7; EX1400, ¶99. That agentless scanning uses cloud APIs is irrelevant since that too was known. EX2076, 11-12; EX1400, ¶¶72-74. Additional quotes similarly describe the unrecited/known features discussed

above such as block-level analysis, connected assets [REDACTED].

EX2118, 4-5; [REDACTED] EX1400, ¶¶72-77.

4. Copying

Driven by a team with comprehensive expertise and experience, Wiz transformed the cloud-security industry. PO tries to capitalize on Wiz’s success by baselessly claiming this was only achieved by copying PO.¹ With no evidence of actual copying, PO alleges “access and similarity,” but PO’s story is internally inconsistent, mischaracterizes evidence, and fails to prove nexus.

The basics of PO’s copying story do not withstand scrutiny. Discussing a 2019 meeting, Mr. Shua [REDACTED]

[REDACTED]. EX2074, ¶¶115-18; EX1402, 184:2-187:1. Nor does he allege mentioning snapshots during the meeting. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ To the contrary, it is PO who has aggressively and systematically copied Wiz. EX1128, 42-50.

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO’s “access” accusations do not salvage its contradictory, misleading copying story. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] But market monitoring—a standard competitive practice—is not indicative of copying patents/product. *Wm. Wrigley Jr. Co. v. Cadbury Adams USA LLC*, 683 F.3d 1356 (Fed. Cir. 2012); EX1400, ¶111; EX1402, 113:12-115:13 (admitting checking competitor websites and refusing to answer whether PO monitors competitors). [REDACTED]

[REDACTED]. See also EX1128, 41 (counterclaim ¶¶14-15) (PO accessing Wiz’s confidential documents). But even if every accusation were true, this would not show copying, since [REDACTED]

[REDACTED]

[REDACTED].

Regardless, PO fails to prove substantial similarity. PO alleges Wiz practices the claims but again outsources the analysis. *Id.*, 54-55. The POR and cited testimony do not explain [REDACTED], do not show how the analysis step is performed, misread evidence cited for element 1.5, and ignore multiple aspects of the claims (e.g., prioritization based on application-use determination). *Id.*; EX2073, ¶¶195-207; EX1400, ¶¶112-114. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Removing any doubt, PO’s own evidence and public statements emphasize the platforms’ differences. EX2076, 7-8, 21-26, 31; EX1126.

Even if PO had shown copying, PO fails to prove nexus. PO does not establish the presumption and, regardless, the allegedly copied features were known (or both known and unrecited). As discussed above, cloud-API-based agentless scanning is not recited or novel. *Supra*, §§V.A-B. [REDACTED]

[REDACTED] (POR, 50), but this is not recited and, regardless, this resource-discovery approach was commonplace. EX1400, ¶115; EX1402, 144:18-145:9 (off-the-shelf API). [REDACTED]

[REDACTED]. *Supra*, §V.B.

The other referenced features—e.g., read-only access, using “block storage level” analysis, and prioritized alerts—were similarly known. *Supra*, §III.B; EX1400, ¶¶71-81.

5. Commercial Success

PO fails to show commercial success, let alone nexus. PO’s discussion of financing, sales, and Wiz’s platform falls flat.

PO’s startup financing evidence consists of self-interested statements and articles quoting such statements. POR, 57-59; *Bayer*, 713 F.3d at 1377. PO’s vague assertion of a connection to the claims is conclusory and unsupported by the evidence. POR, 59; EX1400, ¶¶116-18.

PO’s revenue arguments fail. PO does not establish a nexus presumption (*supra*, §V.A), and PO’s conclusory attribution of sales to the claims is facially insufficient. POR, 60; EX2074, ¶¶98-101; *In re Cree, Inc.*, 818 F.3d 694 (Fed. Cir. 2016). Regardless, the touted features were known and/or unrecited, as previously discussed. EX1400, ¶¶71-74, 118-19; *supra*, §V.B.

Even with nexus, this evidence would not move the needle. PO gives no market-share data, making the sales evidence “very weak” at best. POR, 58-60; *In re Huang*, 100 F.3d 135, 140 (Fed. Cir. 1996). Nor does PO discuss sales compared to the relevant market. *In re Applied Materials, Inc.*, 692 F.3d 1289, 1300 (Fed. Cir. 2012) (market must include “*all* competing” products); EX1402, 107:18-113:8, 118:17-123:10 (admitting PO competes with agent-based platforms). [REDACTED]

[REDACTED] Compare EX2076, 21

with EX2312. [REDACTED]

[REDACTED] EX2074, ¶16 [REDACTED]

[REDACTED] *Galderma Lab’ys., L.P. v. Tolmar, Inc.*, 737 F.3d 731, 740 (Fed. Cir. 2013) (deterrence makes commercial-success evidence “weak”).

PO’s cursory discussion of Wiz’s platform fares even worse. PO makes no nexus showing for Wiz’s platform. POR, 60-61; *SightSound Techs., LLC v. Apple Inc.*, 809 F.3d 1307, 1319 (Fed. Cir. 2015). Labelling Wiz’s platform “infringing” is not analysis (POR, 60), and PO’s earlier argument that Wiz practices the claims falls short. *Supra*, §V.B.4. PO cites API-based agentless scanning, but that was known. EX2116, 1; EX1400, ¶71. PO falsely claims Wiz attributed its success to PO’s approach (POR, 60-61), but PO’s evidence says that “Wiz’s true strength” was not agentless scanning but rather meeting customers’ evolving needs. EX2076, 7-8; EX1400, ¶¶119-21. “Wiz is frightening to the market precisely because they’re not just a history lesson stuck in what they invented, but continue to release just the right features at just the right time....” EX2076, 8.

* * *

PO thus fails to show that any secondary considerations favor non-obviousness. Regardless, PO’s evidence cannot overcome the overwhelming evidence of obviousness. *Wyers v. Master Lock Co.*, 616 F.3d 1231, 1246 (Fed. Cir. 2010).

VI. CONCLUSION

For the above reasons, claims 1-25 are unpatentable and should be canceled.

Respectfully submitted,

Dated: July 15, 2025

/Matthew A. Argenti /
Matthew A. Argenti, Lead Counsel
Reg. No. 61,836

VII. CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. §42.24(d), the undersigned certifies that this Reply complies with the type-volume limitation of 37 C.F.R. §42.24(c). The word count application of the word processing program used to prepare this Reply indicates that the Reply contains 5599 words, excluding the parts of the brief exempted by 37 C.F.R. §42.24(c).

Dated: July 15, 2025

/ Matthew A. Argenti /
Matthew A. Argenti, Lead Counsel
Reg. No. 61,836

VIII. APPENDIX–PETITIONER’S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 11,663,032 to Shua
1002	Declaration of Dr. Angelos Stavrou
1003	Curriculum Vitae of Dr. Angelos Stavrou
1004	File History of U.S. Patent Application No. 18/055,150 ('032 Pat.)
1005	Scheduling Order (Dkt. No. 33), <i>Orca security ltd. v. Wiz, Inc.</i> , No. 1:23cv-00758-GBW (DDE)
1006	Second Amended Complaint for Patent Infringement (Dkt. No. 15), <i>Orca security ltd. v. Wiz, Inc.</i> , No. 1:23cv-00758-GBW (DDE)
1007	U.S. Patent No. 11,216,563 B1 to Veselov
1008	U.S. Publication No. 2013/0191919 A1, published July 25, 2013, to Basavapatna
1009	Wolf, “Virtualization: From the Desktop to the Enterprise” APRESS (2005)
1010	Waldspurger, “Memory Resource Management in VMware ESX Server,” USENIX, Proceedings of the 5th Symposium on Operating Systems Design and Implementation (Dec. 9-11, 2002)
1011	Goldberg, “Survey of Virtual Machine Research,” COMPUTER, Vol. 7, No. 6 (June 1974)

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1012	U.S. Patent No. 10,944,811 B2 to Doctor
1013	Wood, “Black-box and Gray-box Strategies for Virtual Machine Migration” NSDI ’07: 4th USENIX Symposium on Networked Systems Design & Implementation, USENIX
1014	Klemperer, “Efficient Hypervisor Based Malware Detection,” Carnegie Mellon University (May 2015)
1015	vSphere Web Services SDK Programming Guide, VMWare, Inc. (April 17, 2018)
1016	Souppaya, “Application Container Security Guide,” NIST Special Publication 800-190 (Sept. 2017) https://doi.org/10.6028/NIST.SP.800-190
1017	U.S. Patent No. 11,106,784 B2 to Rosendahl
1018	Scarfone, “Guide to Security for Full Virtualization Technologies: Recommendations of the National Inst. of Standards and Technology,” NIST Special Publication 800-125 (Jan. 2011)
1019	U.S. Patent No. 9,881,040 B2 to Rawat
1020	U.S. Patent No. 9,116,633 B2 to Sancheti
1021	“NIST Cloud Computing Standards Roadmap,” NIST Special Publication 500-291, Version 2 (July 2013).
1022	Roberts, “Public Cloud Service Definition,” VMware vCloud® Architecture Toolkit™ for Service Providers, VMware, Inc. (2018)

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1023	ITL Bulletin, “Security Patches and the CVE Vulnerability Naming Scheme: Tools to Address Computer System Vulnerabilities,” NIST (Oct. 2002)
1024	ITL Bulletin, “Preventing and Handling Malware Incidents: How to Protect Information Technology Systems from Malicious Code and Software,” NIST (Dec. 2005)
1025	Cichonski, “Computer Security Incident Handling Guide: Recommendations of the National Institute of Standards and Technology,” NIST Special Publication 800-61, Rev. 2 (Aug. 2012) http://dx.doi.org/10.6028/NIST.SP.800-61r2
1026	ENISA Threat Landscape Report 2018, “15 top Cyberthreats and Trends” V1.0 (Jan. 2019)
1027	Verizon, “2019 Data Breach Investigations Report” (May 2019)
1028	Di Pietro, “Virtualization Technologies and Cloud Security: Advantages, Issues, and Perspectives,” Springer Nature Switzerland AG (2018) https://doi.org/10.1007/978-3-030-04834-1_9
1029	Singh, “Overview of Attacks on Cloud Computing, Int’l. J. of Eng. And Innovative Technology (IJEIT), Vol. 1, Issue 4 (Apr. 2012)
1030	Bairwa, “Vulnerability Scanners: A Proactive Approach to Assess Web Application Security,” Int’l. J. on Computational Sciences & Applications (IJSCA), Vol. 4, No. 1 (Feb. 2014)
1031	Stone, “IT Asset Management,” NIST Special Publication 1800-5 (Sept. 2018) http://doi.org/10.6028/NIST.SP.1800-5
1032	EP Patent No. 3,360,071 B1 to Li

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1033	Garfinkel, “A Virtual Machine Introspection Based Architecture for Intrusion Detection,” Computer Science Dept., Stanford University (2003)
1034	Tang, “VirtAV: An Agentless Runtime Antivirus System for Virtual Machines,” KSII Transactions on the Internet and Information Systems, Vol. 11, No. 11 (Nov. 2017) https://doi.org/10.3837/tiis.2017.11.026
1035	Lengyel, “Scalability, Fidelity and Stealth in the DRAKVUF Dynamic Malware Analysis System (2014) https://doi.org/10.1145/2664243.2664252
1036	U.S. Patent No. 8,613,080 B2 to Wysopal
1037	Bauman, “A Survey on Hypervisor-Based Monitoring: Approaches, Applications, and Evolutions,” ACM Computing Surveys, Vol. 48, No. 1, Article 10 (Aug. 2015)
1038	Suneja, “Exploring VM Introspection: Techniques and Trade-offs,” ACM, VEE’15 (Mar. 2015) http://dx.doi.org/10.1145/2731186.2731196
1039	Payne, “Simplifying Virtual Machine Introspection Using LibVMI,” SANDIA Report-SAND2012-7818, Sandia National Labs. (Sep. 2012)
1040	U.S. Publication No. 2013/0111018 A1 to Ammons
1041	U.S. Patent No. 5,893,131 to Kornfeld
1042	U.S. Patent No. 7,975,305 B2 to Rubin
1043	Jiang, “Stealthy Malware Detection and Monitoring Through VMM-Based “Out-of-the-Box” Semantic View

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
	Reconstruction,” ACM Transactions on Information and System Security, Vol. 13, No. 2, Article 12 (Feb. 2010)
1044	U.S. Patent No. 9,141,805 B2 to Giakouminakis
1045	U.S. Publication No. 2019/0379700 A1 to Canzanese Jr.
1046	U.S. Patent No. 10,783,241 B2 to Crabtree
1047	Bourquin, “Binslayer: Accurate Comparison of Binary Executables,” 2nd ACM SIGPLAN Program Protection and Reverse Engineering Workshop (2013)
1048	U.S. Publication No. 2013/0247133 A1 to Price
1049	Huseinovic – VM Memory Forensics.
1050	Intentionally Left Blank
1051	Using VMware Workstation Pro: VMware Workstation Pro 14.0, VMware, Inc. (December 17, 2017)
1052	VMware VirtualCenter User’s Manual version 1.4, VMware, Inc. (July 7, 2006)
1053	U.S. Publication No.2010/0070725 A1 to Prahlad
1054	U.S. Patent No. 9,830,182 B2 to Ackley
1055	Virtual Disk Programming Guide: vSphere Storage APIs for Data Protection (VADP) 6.0 & Virtual Disk Development Kit (VDDK) 6.0, VMware, Inc. (March 25, 2016)

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1056	U.S. Publication No. 2015/0033221 A1 to Chari
1057	Archived copy of “CWE-200: Information Exposure,” published by MITRE and archived on January 26, 2019, by the Internet Organization’s “Wayback Machine” https://web.archive.org/web/20190126150012/https://cwe.mitre.org/data/definitions/200.html
1058	Archived copy of “CWE-311: Missing Encryption of Sensitive Data,” published by MITRE and archived on January 17, 2019, by the Internet Organization’s “Wayback Machine” https://web.archive.org/web/20190117150049/https://cwe.mitre.org/data/definitions/311.html
1059	Archived copy of “CWE-359: Exposure of Private Information (‘Privacy Violation’),” published by MITRE and archived on January 13, 2019, by the Internet Organization’s “Wayback Machine” https://web.archive.org/web/20190113052451/https://cwe.mitre.org/data/definitions/359.html
1060	Intentionally Left Blank
1061	Intentionally Left Blank
1062	Intentionally Left Blank
1063	U.S. Publication No. 2014/0245376 A1 to Hibbert
1064	U.S. Publication No. 2017/0180318 A1 to Lutas
1065	U.S. Patent No. 9,900,333 B2 to Thakar

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1066	Zhou, “Always Up-to-date—Scalable Offline Patching of VM Images in a Compute Cloud,” 26th annual computer security applications conference (2010)
1067	Jeswani, “ImageElves: Rapid and Reliable System Updates in the Cloud,” 2013 IEEE 33rd International Conference on Distributed Computing Systems (2013)
1068	U.S. Patent No. 8,984,478 B2 to Epstein
1069	U.S. Patent No. 11,061,682 B2 to Vorbach
1070	U.S. Publication No. 2013/0024940 A1 to Hutchins
1071	U.S. Patent No. 9,875,160 B2 to Bezbaruah
1072	U.S. Patent No. 10,536,471 B1 to Derbeko
1073	Ammons, “Virtual machine images as structured data: the Mirage image library,” 3rd USENIX conference on Hot topics in cloud computing (2011)
1074	VMware Infrastructure Architecture Overview White Paper, VMWare, Inc. (2006)
1075	U.S. Patent No. 9,692,778 B1 to Mohanty
1076	U.S. Patent No. 10,055,576 B2 to Milner
1077	U.S. Patent No. 9,824,216 B1 to Khalid
1078	U.S. Publication No. 2020/0097662 A1 to Hufsmith

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1079	Carroll, “Challenges in Modern Digital Investigative Analysis,” published in Forensic Science and Forensic Evidence I, U.S. Att’ys Bull. Vol. 65 No. 1 (January 2017)
1080	U.S. Patent No. 7,831,739 B2 to Lambeth
1081	U.S. Publication No. 2010/0169948 A1 to Budko
1082	United States District Courts—National Judicial Caseload Profile (December 31, 2023) https://www.uscourts.gov/sites/default/files/fcms_na_distprofile1231.2023_0.pdf
1083	Wiz, Inc.’s Stipulation Concerning Invalidity Grounds (Dkt. No. 170), Orca Security Ltd., v. Wiz, Inc., 1:23-cv-00758-JLH (D. Del. December 10, 2024)
1084	Archived copy of “Public Cloud Service Definition,” published by VMware and archived on November 20, 2016, by the Internet Organization’s “Wayback Machine” https://web.archive.org/web/20161120131550/http://www.vmware.com/content/dam/digitalmarketing/vmware/en/pdf/vcat/vmware-public-cloud-service-definition.pdf [served, not filed]
1085	Archived copy of “Binslayer: Accurate Comparison of Binary Executables,” by Bourquin et al., published by 2nd ACM SIGPLAN Program Protection and Reverse Engineering Workshop (2013), and archived on November 3, 2018, by the Internet Organization’s “Wayback Machine” https://web.archive.org/web/20181103234309/https://kar.kent.ac.uk/37627/1/a4-bourquin.pdf [served, not filed]
1086	Archived copy of “State of California: California Technology Agency Infrastructure Consolidation Program Server, Virtualization, Backup and Storage Workgroup,” published by

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
	the California Department of Technology on December 19, 2017, by the Internet Organization’s “Wayback Machine” https://web.archive.org/web/20171219141802/https://cdt.ca.gov/wp-content/uploads/2017/03/TRM_4.17.865.002_Server_Virtualization_Practices_12152010_r1.pdf [served, not filed]
1087	Supplemental Declaration of Dr. Angelos Stavrou [served, not filed]
1088-1111	Intentionally Left Blank
1112	Stipulation and Order for Stay Pending Inter Partes Review (Dkt. No. 233), Orca Security Ltd., v. Wiz, Inc., 1:23-cv-00758-JLH (D. Del. January 16, 2025)
1113	Email exchange between counsel for Wiz, Inc., counsel for Orca Security Ltd., and the PTAB Clerk (Feb. 24, 2025–Feb. 25, 2025)
1114	Avi Shua June 12, 2025, deposition exhibit of U.S. Patent No. 11,943,251 (June 12, 2025)
1115	Avi Shua deposition exhibit of “Cloud Security: Vendor Landscape and TCO Analysis,” Orca Security Ltd. (June 12, 2025) https://orca.security/lp/tag-cyber-cloud-security-vendor-landscape-tco-analysis (accessed June 11, 2025)
1116	Avi Shua deposition exhibit of Application No. 62/797,718 (June 12, 2025)
1117	Joint Claim Construction Brief (Dkt. No. 202), <i>Orca security ltd. v. Wiz, Inc.</i> , No. 1:23cv-00758-GBW (DDE)
1118	Dr. Kaeli deposition exhibit of US Patent No. 10,834,050 (June 19, 2025)

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1119	Dr. Kaeli deposition exhibit of US Patent No. 9,805,202 (June 19, 2025)
1120	Dr. Kaeli deposition exhibit of US Patent No. 10,956,242 (June 19, 2025)
1121	Dr. Kaeli’s June 19, 2025, deposition exhibit of an archived copy of “CreateSnapshot,” archived by the Internet Archive’s “Wayback Machine” https://web.archive.org/web/20141226192222/https://docs.aws.amazon.com/AWSEC2/latest/APIReference/API_CreateSnapshot.html (December 26, 2014)
1122	Nexpose User’s Guide, Product Version: 5.16, Rapid7, LLC. Copyright (2015)
1123	Nessus Enterprise for Amazon Web Services (AWS) Installation and Configuration Guide, Copyright © 2014. Tenable Network Security, Inc., Revision 2 (July 16, 2014)
1124	Configuring AWS EC2 Connectors with Cross-Account Role Authentication (ARN), Hari Srinivasan (/discussions/s/profile/0052L000003olee), (April 24, 2018) (last modified April 27, 2018)
1125	Redefining CNAPP: A Complete Guide To the Future of Cloud Security, Francis and James Berthoty, https://softwareanalyst.substack.com/p/redefining-cnapp-a-complete-guide
1126	How Orca Security Compares to Wiz, https://orca.security/resources/comparisons/wiz/ , Orca Security (2025)

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1127	Veselov LinkedIn, https://www.linkedin.com/in/vladimir-veselov-2769753/details/experience/ (personal information redacted)
1128	<i>Orca Security Ltd. v. Wiz, Inc.</i> , C.A. No. 23-0758-JLH, Defendant Wiz Inc.’s Answer To Second Amended Complaint And Counterclaims, Case 1:23-cv-00758-JLH, Document 70, (June 4, 2024)
1129	Michael et al. US Patent No. 8,011,010 B2 (April 17, 2007)
1130	Intentionally Left Blank
1131	Amazon EC2 Backup and Recovery with Snapshots and AMIs - AWS Prescriptive Guidance, https://docs.aws.amazon.com/prescriptive-guidance/latest/bachup-recovery/ec2-backup.html , (2025)
1132	Creating an Amazon EBS-Backed Linux AMI, https://web.archive.org/web/20170601003305/https://docs.aws.amazon.com/AWSEC2/latest/UserGuide/creating-an-ami-ebs.html , Amazon Web Services, Inc. (2017)
1133	Amazon EBS volumes, Amazon EBS, https://docs.aws.amazon.com/ebs/latest/userguide/ebs-volumes.html , Amazon Web Services, Inc. (2025)
1134	Symantec Data Loss Prevention Solution, Symantec Corporation (2015)
1135	“Deployment Guide,” Forcepoint, DLP ver., 8.4.x (2017)
1136	McAfee Skyhigh Security Cloud, Data Security for the Cloud Era, McAfee, LLC. (2018)
1137	“Google Announces Agreement to Acquire Wiz” Inside Google, Google LLC., https://www.prnewswire.com/news-

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
	releases/google-announces-agreement-to-acquire-wiz-302404500.html/
1138	“Security Audit” Reference Guide by Amazon https://docs.aws.amazon.com/aws-managed-policy/latest/reference/SecurityAudit.html)
1139-1399	Intentionally Left Blank
1400	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1401	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1402	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1403	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1404	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1405	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1406	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1407	[REDACTED] [PROTECTIVE ORDER MATERIAL]

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL – ATTORNEY’S EYES ONLY
REDACTED

Exhibit No.	Description
1408	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1409	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1410	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1411	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1412	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1413	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1414	[REDACTED] [PROTECTIVE ORDER MATERIAL]

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Petitioner’s Reply to Patent Owner’s Response and Exhibits EX1114 - EX1138 and EX1400- EX1414 were served on July 15, 2025, at the following electronic service addresses:

Christopher Henry
Raghav Bajaj
Kristina McKenna
Douglas E. Lumish
Blake R. Davis
Steven W. Peters
Lucas Lonergan
Nicole E. Bruner
Latham & Watkins LLP
christopher.henry@lw.com
raghav.bajaj@lw.com
krissy.mckenna@lw.com
doug.lumish@lw.com
blake.davis@lw.com
steven.peters@lw.com
lucas.lonergan@lw.com
nicole.bruner@lw.com

Dated: July 15, 2025

/ Matthew A. Argenti /
Matthew A. Argenti, Lead Counsel
Reg. No. 61,836