Filed on behalf of: Orca Security Ltd.

Entered: February 13, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WIZ, INC.,
Petitioner,

v.

ORCA SECURITY LTD.,
Patent Owner.

Case IPR2024-00865
Patent No. 11,693,685

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Orca Security Ltd. respectfully submits the following current exhibit list:

Exhibit	Description
2001	Declaration of David R. Kaeli, Ph.D. ("Kaeli Decl.")
2002	*Curriculum Vitae* of David R. Kaeli, Ph.D.
2003	RESERVED
2004	RESERVED
2005	U.S. Pat. App. Pub. No. 2008/0320583 A1 ("Sharma")
2006	*Virtual Machine Snapshots*, *Red Hat Virtualization 4.3: Technical Reference: The Technical Architecture of Red Hat Virtualization Environments* (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 – *Virtual Machine Snapshots*")
2007	Dominik Birk, *Technical Challenges of Forensic Investigations in Cloud Computing Environments* (Jan. 12, 2011), https://cachin.com/cc/csc2011/submissions/birk.pdf (last visited Sept. 7, 2024)
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

Exhibit	Description
2014	Complaint for Patent Infringement, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. July 12, 2023), ECF No. 1 ("Orca Compl.")
2015	Oral Order (Joint Motion for Discovery Dispute Teleconference), *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. May 17, 2024), ECF No. 62 ("Oral Order")
2016	Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) ("Pet'r's Invalidity Contentions")
2017	RESERVED
2018	Abraham Silberschatz et al., *Operating System Concepts* (9th ed. 2013) (excerpt)
2019	RESERVED
2020	MahMush, *Snapshots vs. Images – Which One to Choose?*, Huawei (Sept. 15, 2021, 17:55:10), https://forum.huawei.com/enterprise/en/snapshots-vs-images-which-one-to-choose/thread/773699-893 ("Huawei - *Snapshots vs. Images*")
2021	Amazon Web Service (AWS), *What Is a Hypervisor?* (2024), https://aws.amazon.com/what-is/hypervisor/ (last visited Sept. 11, 2024)
2022	Diego Perez-Botero et al., *Characterizing Hypervisor Vulnerabilities in Cloud Computing Servers*, Conference: Proceedings of the Workshop on Security in Cloud Computing (SCC), Hangzhou, China 1–8 (May 8, 2013) ("Perez-Botero, *Characterizing Hypervisor Vulnerabilities*")
2023	U.S. Pat. No. 8,220,053 B1 ("Sun")

Exhibit	Description
2024	Jinpeng Wei et al., *Managing Security of Virtual Machine Images in a Cold Environment*, Conference: Proceedings of the First ACM Cloud Computing Security Workshop (CCSW), Chicago, Illinois 1–6 (Nov. 13, 2009) ("Wei, *Managing Security of Virtual Machine Images*")
2025	Red Hat, *Red Hat OpenStack Platform 11: Instances and Images Guide – Managing Instances and Images* (updated Feb. 19, 2018), https://docs.redhat.com/en-us/documentation/red_hat_openstack_platform/11/pdf/instances_and_images_guide/Red_Hat_OpenStack_Platform-11-Instances_and_Images_Guide-en-US.pdf ("Red Hat Open Stack")
2026	RESERVED
2027	Steve Lasker, *Key Differences Between VM and Container Vulnerability Scanning*, 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	RESERVED
2032	RESERVED
2033	RESERVED
2034	Exhibit C-1, Invalidity of United States Patent 11,693,685 (the "'685 Patent") by Veselov, attached to Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)

Exhibit	Description
2035	Exhibit C-4, Invalidity of United States Patent 11,693,685 (the "'685 Patent") by Price, attached to Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2036	Exhibit C-2, Invalidity of United States Patent 11,693,685 (the "'685 Patent") by Hufsmith, attached to Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2037	RESERVED
2038	RESERVED
2039	Appendix C, Invalidity of United States Patent 11,693,685 (the "'685 Patent"), attached to Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) (Ex. 2016)
2040	Stipulation and Order, *Orca Sec. Ltd. v. Wiz, Inc.*, 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 [*served, not filed*]
2042	Declaration of Douglas E. Lumish Pursuant to 37 C.F.R. § 42.10(c)(2)

Respectfully submitted,

Dated: February 13, 2025

By: / Christopher Henry /

Christopher Henry (Reg. No. 60,907)
christopher.henry@lw.com
Latham & Watkins LLP
200 Clarendon Street
Boston, MA 02116
Telephone: 617.948.6000

Fax: 617.948.6001

Counsel for Patent Owner
Orca Security Ltd.

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 13th day of February, 2025, a true and correct copy of the foregoing **Patent Owner's Updated Exhibit List and Exhibit 2042** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

Matthew A. Argenti (Reg. No. 61,836)
Michael T. Rosato (Reg. No. 52,182)
Wesley E. Derryberry (Reg. No. 71,594)
Joseph M. Baillargeon (Reg. No. 79,685)
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304
Tel.: 650.354.4154
Fax: 650.493.6811
margenti@wsgr.com
mrosato@wsgr.com
wderryberry@wsgr.com
jbaillargeon@wsgr.com

By: / Christopher Henry /

Christopher Henry (Reg. No. 60,907)
christopher.henry@lw.com
Latham & Watkins LLP
200 Clarendon Street
Boston, MA 02116
Telephone: 617.948.6000
Fax: 617.948.6001

Counsel for Patent Owner
Orca Security Ltd.