

Filed on behalf of: Orca Security Ltd.

Entered: August 28, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WIZ, INC.,
Petitioner,

v.

ORCA SECURITY LTD.,
Patent Owner.

IPR2024-00865
Patent 11,693,685

PATENT OWNER'S MOTION TO SEAL

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Patent Owner Orca Security Ltd. (“Orca” or “Patent Owner”) respectfully requests the Board authorize the filing under seal of Patent Owner’s Opposition to Petitioner’s Motion to Exclude (“Patent Owner’s Opposition”).¹ Good cause exists to seal this document.

Patent Owner’s Opposition is filed in opposition to Petitioner’s Motion to Exclude (Paper 52), which Petitioner filed concurrently with a Motion to Seal (Paper 51). In Petitioner’s Motion to Seal (Paper 51), Petitioner stated that its Motion to Exclude contained “information previously designated confidential and filed under seal in this IPR and/or sensitive, non-public information that would significantly harm Wiz’s competitive position if made public.” Paper 51, 1. Petitioner further stated that the “terms of the joint protective order were agreed-upon by the parties and have already been entered by the Board” in Paper 37. *Id.* Finally, Petitioner stated that its Motion to Exclude Evidence contained “discussion of documents that ... have been previously designated confidential and filed under seal” and sought to maintain the protections of that information. Paper 51, 3.

Patent Owner’s Opposition discusses the same information that Petitioner sought to seal in its Motion to Seal (Paper 51), and accordingly, Patent Owner moves

¹ Patent Owner will file redacted copies of Patent Owner’s Opposition to Petitioner’s Motion to Exclude after conferring with Petitioner.

to seal Patent Owner's Opposition; good cause exists to seal the information for the reasons presented in Petitioner's Motion to Seal (Paper 51).

For the reasons set forth above, Patent Owner respectfully requests the Board grant this motion to seal.

Respectfully submitted,

Dated: August 28, 2025

By: / Raghav Bajaj /

Raghav Bajaj (Reg. No. 66,630)
raghav.bajaj@lw.com
Latham & Watkins LLP
300 Colorado St., Suite 2400
Austin, TX 78701-3295
Telephone: 737.910.7300
Fax: 737.910.7301

*Counsel for Patent Owner
Orca Security Ltd.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 28th day of August, 2025, a true and correct copy of the foregoing **Patent Owner's Motion to Seal** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

Matthew A. Argenti (Reg. No. 61,836)
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304
Tel.: 650.354.4154
Fax: 650.493.6811
margenti@wsgr.com

Michael T. Rosato (Reg. No. 52,182)
WILSON SONSINI GOODRICH & ROSATI
701 Fifth Avenue, Suite 5100
Seattle, WA 98104
Tel.: 206-883-2529
Fax: 206-883-2699
mrosato@wsgr.com

Wesley E. Derryberry (Reg. No. 71,594)
Tasha M. Thomas (Reg. No. 73,207)
Joseph M. Baillargeon (Reg. No. 79,685)
WILSON SONSINI GOODRICH & ROSATI
1700 K Street, NW, Fifth Floor
Washington, DC 20006
Tel.: 202-973-8947
Fax: 202-973-8899
wderryberry@wsgr.com
tthomas@wsgr.com
jbailargeon@wsgr.com

By: / Raghav Bajaj /

Raghav Bajaj (Reg. No. 66,630)
raghav.bajaj@lw.com
Latham & Watkins LLP
300 Colorado St., Suite 2400
Austin, TX 78701-3295
Telephone: 737.910.7300
Fax: 737.910.7301

*Counsel for Patent Owner
Orca Security Ltd.*