

PROTECTIVE ORDER MATERIAL
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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 No. 11,693,685

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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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, but the record shows that Wiz’s industry-changing achievements were driven by the team’s deep expertise and sustained innovation. PO’s other secondary-considerations arguments similarly fail.

II. CLAIM CONSTRUCTION

A. “location”

PO does not dispute Wiz’s construction. Paper 32 (“POR”), 5-7. Moreover, PO’s expansive view of “location” reinforces obviousness. *Id.*, 53; EX2074, ¶44; EX1402, 130:16-140:5 (volumeId provides disk location), 135:16-137:5; EX1400, ¶9.

B. Analyze/Analyzing “the at least one snapshot”

PO’s argument that the claims exclude Veselov’s instantiated assessment-VM approach is contradictory and irrelevant. POR, 5-7.

PO’s argument has numerous contradictions. EX1400, ¶10. PO does not explain contrary positions in its district-court complaint (Pet., 10-11; EX1006, 23, 57-58), claim-construction briefing (EX1117, 64 (“indirect analysis” of snapshot), 67-68 (POPR assertion not limiting)), and the specification/provisional (EX1001, 7:34-

49; EX2149, ¶¶22, 43; EX1401, 33:12-36:11; EX1402, 215:5-222:7). PO elsewhere argues a document describing “examin[ing] the VMs spun up from the snapshot” shows Wiz analyzing the snapshot. IPR2024-00864, Paper 32 (“032-POR”), 54-55 (citing EX2026, 2-3); *see also* EX1401, 30:15-31:17 (“spinning up” VM “interchangeable” with instantiating), 127:7-131:8; EX1402, 187:2-203:14, 249:11-258:2.

Regardless, the petition does not depend on the assessment-VM approach, mooting PO’s claim-construction argument. *Infra*, §III.A; Pet., 37-40; POR, 7.

III. GROUND 1

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

A. The Petition Does Not Improperly Mix Embodiments

PO maintains that Veselov discloses siloed embodiments with APIs limited to Figs. 1/3A/3B. POR, 8, 10-14. PO contends that Veselov’s API usage depends on implementation by a cloud “service provider” hosting resources—whereas the 5A/5B snapshot analysis is limited to “on-premises systems.” *Id.*, 12-14. Veselov flatly contradicts this.

Veselov’s 5A/5B environment encompasses hosting by a service provider, identified as an undepicted aspect. EX1007, 18:1-15; EX1400, ¶¶11-12.

Moreover, 5A/B has the same “implementation” as the 3A/3B environment PO

admits is “implemented” by the service provider. POR, 10; EX1007, 16:56-67; EX1400, ¶12. The environments have the same “interactions” (EX1007, 16:56-67), which PO admits involves APIs. POR, 10-13; EX1400, ¶12.

PO’s additional points also fail. PO claims Wiz cited separate disclosures “without explanation.” POR, 10; *but see, e.g.*, Pet., 15-18, 27-28; EX1002, ¶¶87-91. PO claims the Figure-1 environment is not suitable for snapshot analysis (POR, 10, 13-14), but Veselov says otherwise. EX1007, 3:20-4:29, 8:34-45, 10:1-16; EX1400, ¶13. PO argues that Fig. 1 involves a snapshot-storage service (POR, 10-11), but that is optional. EX1007, 5:9-22. PO argues that the only API calls in the Figure-1 embodiment are initial user scan requests (POR, 10-11), but Veselov broadly teaches API-mediated interactions between the scanning service and the environment/provider. EX1007, 5:1-8. Indeed, that is how virtually every cloud-security platform operated. EX1400, ¶¶80-82, 14-15 (citing EX1122, 20, 164-66; EX1123, 3, 9-12; EX1124).

B. PO’s Attack on the Combination Fails

PO says the references are not analogous because Hufsmith discusses container/VM images whereas Veselov discusses volume images/snapshots. POR, 15. But PO identifies no relevant technical distinction. As Dr. Stavrou explains, “image” is often used generally to mean disk/system state, and the machine-image resource typically just contains one or more snapshots plus metadata. EX1400,

¶¶16, 18-21 (citing EX1040, ¶43; EX1129, 2:28-48). In any case, the relevant underlying data being analyzed—e.g., files, applications, etc.—is equivalent. *Id.* PO claims Hufsmith’s teachings are limited to pre-deployment source-code analysis and are therefore not applicable. POR, 15, 16-17. But this mischaracterizes Hufsmith and improperly attacks bodily incorporation. EX1400, ¶¶17-18, 20-21, 28; EX1078, ¶¶108 (applicable during development “and deployment”), 154 (broad applicability of teachings from development-environment example); *Allied Erecting & Dismantling Co. v. Genesis Attachments, LLC*, 825 F.3d 1373, 1381 (Fed. Cir. 2016).

PO has no meaningful response to either demonstrated benefit: more complete assessment of security concerns (including sensitive data) and more efficient/targeted review of critical issues (e.g., minimizing alert fatigue). Pet., 23-25. PO argues that making something “better” or “more efficient” is too generic (POR, 19), but the stated rationale goes far beyond that. PO claims Hufsmith does not detect/report sensitive data (POR, 16), but this claim-mapping argument is flawed as explained below. *Infra*, §III.C.2.

PO’s additional responses fare no better. PO claims Veselov’s identification of security issues of varying importance is “unfounded” (POR, 17) but ignores extensive corroboration. EX1002, ¶¶110-11; *see also id.*, ¶¶64-68. PO claims EX2075 states that “containers are ‘less secure’ than VMs” (POR, 15-17), but the

selectively quoted statement actually compares different container configurations. EX2075, 6. Regardless, Hufsmith teaches applicability to both containers and VMs. EX1400, ¶¶22-26, 33; EX1078, ¶¶3, 26, 49, 52, 149, 159. PO claims Veselov's results can be evaluated "without issue" (POR, 17-18), but Veselov gives no indication that filtering/prioritization would not be beneficial, and motivation does not require a reference to criticize itself. EX1400, ¶¶27-30; *Janssen Pharms., Inc. v. Teva Pharms. USA, Inc.*, 97 F.4th 915, 929-30 (Fed. Cir. 2024).

Wiz showed that arriving at the claims merely involved using known elements according to their known function to achieve predictable results. Pet., 22-23 (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, 18-19. 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. Pet., 25. PO claims Wiz did not address sensitive-data detection without interacting with the VM (POR, 19), but that is precisely the context Wiz addressed. Pet., 25, 40. PO claims Wiz's introduction of a DSPM platform shows that sensitive-data detection was not well-understood and predictable. POR, 19 (citing EX2154; EX2155, 2). But DSPM goes far beyond sensitive-data *detection* and neither cited document

indicates that such detection was a problem. EX1400, ¶¶31-32. Dr. Stavrou confirms that sensitive-data detection was common. *Id.*, ¶¶86-88 (citing EX1134, 1-7; EX1135, 5; EX1136, 1-3; EX1056, ¶¶38-42); EX1002, ¶55. Indeed, the '685 specification does not explain how sensitive data is detected. *Id.* (citing EX1001); *see also* EX1401, 141:11-146:14, 146:15-155:2.

PO also alleges a POSA would not have thought snapshots provided sufficient information. POR, 20. But the cited testimony does not say this (EX2073, ¶¶181-85), and PO ignores Wiz's evidence. Pet., 25; EX1078, ¶¶135-143; EX1002, ¶112 (citing EX1008, ¶¶138-39; EX1063, ¶¶13, 189). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

C. The Combination Satisfies the Claims

1. Elements 1.2-1.4

Largely ignoring Wiz's analysis and evidence, PO relies on flawed logic and mischaracterizations.

Regarding disk-identification, PO argues that virtual disks and VMs are not synonymous (POR, 21), but Wiz never said they were. PO argues that Veselov can obtain snapshots from a snapshot-storage service (POR, 21-22), but Wiz did not

rely on this optional component. Pet., 26-35. PO claims the petition simply mapped elements 1.2-1.4 to VM identification, whereas VMs and virtual disks “can” have different locations. POR, 21-22. PO appears to be referencing an alternative mapping for element 1.3 discussing VM-address queries (Pet., 34), and even for that PO does not respond to Wiz’s analysis. *See also* EX1400, ¶¶35-38, 42 (citing EX1133) (instance/disk typically co-located).

Wiz showed that a POSA would have understood utilizing cloud APIs to perform virtual-disk identification to be part of (or suggested by) Veselov’s process for obtaining/accessing the snapshot. Pet., 30-31; *Janssen*, 97 F.4th at 928 (references read from POSA’s perspective for all they fairly suggest). PO responds with its flawed embodiment-mixing argument. POR, 22-24; *supra*, §III.A; EX1007, 5:1-9; EX1400, ¶39. PO implies Wiz merely showed that API-based virtual-disk identification was routine. POR, 22 n.4. But this technique “was a routine part of generating snapshots as described in Veselov.” Pet., 31-32; EX1400, ¶¶40-41, 80-82; *see also infra*, §VI.B (snapshot-generating API call requires “volumeId”).

PO responds to Wiz’s snapshot-tailoring arguments with similar deflection, claiming Veselov merely suggests user-provided disk locations. POR, 24-25. But Veselov describes the *scanner* identifying data elements (e.g., a virtual disk) for the snapshot. Pet., 32. And, the claims don’t exclude user involvement. PO also

falsely claims the petition relied on a modification. POR, 24-25; EX1400, ¶38; *supra*, §III.A. Wiz’s actual analysis—explaining the POSA’s understanding of Veselov—stands unrebutted.

PO’s additional element 1.3 arguments fail. PO argues that if the scanning service generates the snapshot, it does not query disk locations via cloud APIs, but does not explain this non-sequitur. POR, 25-26 (citing EX2073, ¶¶135-37). Dr. Kaeli treats Veselov as limited to obtaining snapshots from storage, ignoring description of taking new snapshots. EX2073, ¶132; EX1007, 8:60-9:41; *see also id.*, 5:1-9 (scanner interacts with provider/environment via APIs). PO argues that the only disclosed queries involve the snapshot-storage service (POR, 26), but that service is optional (EX1007, 5:9-22), and PO’s focus on the word “query” is misguided. EX1400, ¶¶44-45; *Adasa Inc. v. Avery Dennison Corp.*, 55 F.4th 900, 910 (Fed. Cir. 2022) (verbatim disclosure of claim language not required); *Janssen*, 97 F.4th at 928. PO argues that the routine nature of these limitations is insufficient (*id.*), but Wiz’s actual analysis—explaining why the recited query was obvious since it was the well-known, routine way of doing what Veselov describes—stands unrebutted. Pet., 33-34.

PO’s additional arguments for element 1.4 also fail. The petition presented two alternative arguments. For the first, PO repeats its flawed element 1.3 arguments. POR, 26. For the second, PO does not dispute Wiz’s showing that the

address of the VM is a general location of the attached disk. *Id.*, 26-27; Pet., 12, 34-35; EX1400, ¶46.

PO fails to address Wiz’s alternative UI-based mappings for elements 1.2-1.4, involving disk identification and location querying via a cloud-API-based user interface. Pet., 28-29 (separate UI mapping for element 1.1), 32-34 (same alternative mapping for elements 1.2-1.4); EX1400, ¶43. PO’s failure to respond leaves this alternative mapping undisputed.

PO’s secondary-considerations arguments are wrong and, regardless, do not rebut obviousness. *Infra*, §VI. PO touts its alleged use of cloud APIs to identify/locate disks (POR, 27), but this was commonplace. EX1400, ¶¶80-82; *infra*, §VI.B. PO tries to distinguish Veselov, which PO says “[s]imply identif[ies] a VM,” (POR, 27), but this mischaracterizes Veselov—and regardless, as explained above, Wiz demonstrated multiple ways that Veselov teaches these steps even when identifying the VM first. EX1007, 6:34-39 (request may just identify user); EX1400, ¶42.

2. Element 1.6

PO repeats its pre-institution argument that Hufsmith does not detect sensitive data, just its potential exposure. POR, 28; *see also* Paper 8, 41-42, 43-44 (rejecting argument). Though nominally referring to the combination, PO focuses on Hufsmith rather than the combination’s detection of sensitive data in Veselov’s

snapshot. *Id.*; Pet., 23-25, 39-40; *Palo Alto Networks, Inc. v. Centripetal Networks, LLC*, 122 F.4th 1378, 1386 (Fed. Cir. 2024) (arguments attacking references individually lack merit). Regardless, PO's semantic complaint does not respond to Wiz's showing that detecting that sensitive data stored on the system may be exposed suggests detecting that data, nor refute Wiz's additional obviousness reasoning. Pet., 39-40; EX1002, ¶¶159-60; EX1400, ¶¶47-49; *Adasa*, 55 F.4th at 910 (verbatim disclosure not required).

PO's additional arguments fall flat. PO asks the Board to ignore evidence of the routine nature of sensitive-data detection (POR, 29), but evidence of the POSA's knowledge is core to the obviousness inquiry. *Ariosa Diagnostics v. Verinata Health, Inc.*, 805 F.3d 1359, 1365 (Fed. Cir. 2015); *KSR*, 550 U.S. at 418. PO's attack on EX1036 adds nothing beyond PO's flawed attack on Hufsmith, and PO mischaracterizes Chari. *Infra*, §IV; EX1400, ¶50. PO argues that the routine nature of sensitive-data detection is refuted by praise and copying of PO's sensitive-data detection in combination with other elements. POR, 29. But in addition to numerous other flaws discussed below (*infra*, §VI), Dr. Stavrou confirms that sensitive-data detection was common in cloud-security platforms and there is nothing special about detecting such data in snapshots. EX1400, ¶¶86-88.

3. Element 1.8

PO's arguments for the reporting limitation are unconvincing. PO reiterates its "potential" exposure argument, discussed above. *Supra*, §III.C.2; EX1400, ¶51. PO's remaining arguments focus on semantics and fail to address the combination.

PO's "alert" arguments remain unconvincing. POR, 30-31. Verbatim use of claim terms is not required, and Veselov does not merely describe reporting results generally. *Adasa Inc. v. Avery Dennison Corp.*, 55 F.4th 900, 910 (Fed. Cir. 2022). It brings specific problems/remediations to the user's attention, which is what PO says alerts do. Pet., 42; EX1007, 10:17-36 (results identify remediation and are sent "in a user-readable format ... to be displayed on the user device"), 20:57-21:13, 23:19-47; EX1400, ¶51; Kaeli, ¶151; *see also* EX1401, 95:3-108:12 (unable to identify content requirement for "alert").

PO's bodily-incorporation arguments are similarly misguided. PO argues that Hufsmith's source-code annotations are inapplicable because Veselov involves read-only snapshots. POR, 31-32. But Wiz did not propose bodily incorporation of source-code annotations, nor is that the test. Pet., 22-25, 42; *In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012). PO does not dispute Hufsmith's teaching that the development-environment techniques are broadly applicable to other reporting techniques, arguing only that Wiz did not explain motivation to apply them. POR,

32 n.5. But this ignores Wiz's detailed motivation explanation. Pet., 22-25.

EX1400, ¶¶52-53.

PO's invocation of secondary considerations falls flat. POR, 32-33; *Infra*, §VI. PO does not even show that it practices this element. *Infra*, §VI.A.

Regardless, Dr. Stavrou confirms that alert filtering/prioritization was ubiquitous.

EX1400, ¶¶54, 84-85 (citing EX1048, ¶¶17, 41-45; EX1063, ¶¶80, 100-13).

4. Claims 2/14

PO does not dispute the page-file aspect of claims 2/14 but claims Wiz contradicts its admission in IPR2024-00863 that Veselov does not expressly describe inactive analysis. POR, 33-34. But express disclosure is not required. *Janssen*, 97 F.4th at 928 (references read for all they fairly suggest). Rather, Wiz explained that Veselov's state-independent technique suggests analyzing the snapshot while the VM is inactive. Pet., 45-46. PO claims Wiz's showing that a POSA would have expected many target VMs to be inactive is contradicted by Veselov's goal of avoiding interference with active VMs. POR, 33-34 (citing EX1007, 2:45-57). But Veselov simply describes a drawback of existing systems, not that all cloud assets are always active. EX1007, 2:42-3:19. Moreover, the POSA's understanding that many target VMs would already be inactive is thoroughly corroborated. EX1002, ¶¶178-80 (citing EX1066; EX1067; EX1073); EX1400, ¶¶55-56; [REDACTED] *see*

also EX1402, 106:18-107:17; EX1401, 109:18-112:19 [REDACTED]

[REDACTED].

5. Claims 7/19

PO relies solely on its flawed arguments for the independent claims, leaving Wiz's additional analysis unrebutted. POR, 34; EX1400, ¶57.

IV. GROUND 2

PO says there is no motivation because Chari identifies sensitive data by interacting with the target VM. POR, 62. This attacks the references individually and mischaracterizes Chari as limited to running VMs. Pet., 62; EX1056, ¶94; EX1400, ¶¶58-60. PO's insistence that Chari's "label[ing] and sanitiz[ing] the snapshot" does not involve detecting that data is frivolous. POR, 63; EX1056, ¶94. Even if Chari relied on previous detection of the sensitive data in a live VM, as PO claims—and Chari gives no indication of this—PO cannot explain how the system could then label/sanitize that data in the snapshot without detecting it there. EX1400, ¶¶61-62.

V. GROUND 3

PO's arguments against Price are unconvincing. PO claims inactive analysis contradicts Veselov's supposed goal of keeping VMs active. POR, 66. But Veselov does not teach away from inactive analysis, and PO does not dispute the combination's benefits. Pet., 65-67; EX1400, ¶¶63-64. PO claims there is no

evidence that snapshots can be used for analysis of inactive VMs (POR, 66), but the petition shows otherwise. Pet., 45-46, 66-67, 69 (same); EX1002, ¶¶33-36, 181, 240-44, 247-50; EX1400, ¶66; *see also* EX1402, 160:18-161:20 (“CreateSnapshot” API call works regardless of VM’s state). PO argues that Price analyzes VM images, not snapshots, but this attacks the references individually. POR, 66; *Palo Alto Networks*, 122 F.4th at 1386.

PO’s Huseinović arguments fare no better. PO claims Huseinović describes suspended-state page file preservation as a shapshotting alternative (POR, 66), but Huseinović describes capturing the same page file from the suspended machine and from suspended-state snapshotting, which was standard in many platforms. EX1049, 941; EX1002, ¶¶33-36, 181-83, 240-44, 247-50; EX1400, ¶65. PO argues lack of motivation to use VMware in Veselov (POR, 66-67), but bodily incorporation is not the test. *In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012). PO claims Huseinović discourages powering down VMs. POR, 67. Mischaracterization aside, this does not address Wiz’s first argument involving suspended VMs or Wiz’s alternative argument involving already-powered-off VMs. Pet., 69-70; EX1400, ¶64.

VI. 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, 38-40; *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 and sensitive data," yet in [REDACTED]

[REDACTED]. EX2067, 9-10; EX1402, 76:7-77:10 [REDACTED]

[REDACTED]; EX1400, ¶¶67-76. [REDACTED]

[REDACTED] EX2300, 11. The abundance of significant unrecited features is confirmed by unexplained [REDACTED]. POR, 40-41 (citing EX2300); *see also* EX1402, 102:2-106:17 [REDACTED] EX1401, 56:15-57:6 [REDACTED]

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 '685 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; 032-POR, 31-61;

IPR2024-01109, Paper 30, 30-67; IPR2024-01190, Paper 28, 33-62; IPR2024-01191, Paper 29, 33-65.

PO also fails its burden for the “embodiment” requirement. PO provides no analysis for elements 13.4/22.4, 1.5/13.5/22.5, and 1.8/13.8/22.8, and a single sentence for dependent claims. POR, 38-39; EX1400, ¶77; *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] [REDACTED] Shua, ¶¶36-48; *compare id.*, ¶41 *with id.*, ¶44. He relies on [REDACTED]. *Id.*, ¶47. He never explains how the identified alerts are filtered and prioritized “based on” the previously identified risk level. *Id.*, ¶¶61-64.

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, ¶¶78-79.

Cloud-API-based agentless scanning was likewise known. *Supra*, §III.C.1;

EX1400, ¶80. Indeed, cloud-API calls—

—were the core communication

mechanism for cloud-security products. *Pet.*, 31-34; EX1002, ¶¶42, 133-34, 141;

EX1400, ¶¶81-82, 89 (citing EX1122, 20, 164-65, 166; EX1123, 3, 9, 10-12;

EX1124). PO touts

EX1400, ¶¶81-82 (citing EX1121); EX1401, 121:7-126:8. 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 and a need for at-rest protection. *POR*, 35-38. Both fall flat.

PO touts offline scanning and emphasizes agents’ limitations, but the alleged solution—agentless scanning—was known. *POR*, 36-38 ; *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, ¶79. There is little daylight

between the touted features and Veselov. EX1400, ¶¶79-92; *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”).

The alleged need for sensitive-data detection also fails to withstand scrutiny. PO selectively quotes EX2152 (POR, 37), but the full quote addresses “locating and classifying the entirety of an organization’s data,” not merely locating sensitive data. EX2152, 5. Regardless, the next sentence describes a company addressing this in 2018. *Id.*; *see also, id.*, 34, 41 (other pre-2019 companies detecting sensitive data). Dr. Stavrou confirms that sensitive-data detection was commonplace. EX1400, ¶¶86-88.

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, 35-38 (citing Shua, ¶¶90-101; EX1001; EX2082-2083; EX2099-2100); EX1402, 259:2-260:12 [REDACTED] [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, ¶¶97-99 (companies “disagreed” that network/agent-based scanners were inadequate).

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, 37-38 (citing Shua, ¶¶13-24, 100-01). 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, ¶¶93-94. 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, 41-43; EX2076, 7-8, 11; EX2106, 1; [REDACTED] EX1400, ¶¶95-99.

[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”). [REDACTED]

[REDACTED]

3. Praise

PO’s discussion and cited evidence does not prove industry praise with nexus.

The 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. Several so-called “awards” were sponsored by PO’s investors and PO commissioned the TAG Security Report (EX2118). EX1402, 177:3-184:1; EX1400, ¶¶100-102 (citing EX2129-2131; EX2143-2145). Indeed, given the number of undisclosed relationships already 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*, §VI.A), and PO’s conclusory assertion of a connection does not satisfy its burden. POR, 43; EX1400, ¶¶103-04. 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, ¶¶74, 104; *supra*, §§VI.A, VI.B.

PO’s discussion of Wiz’s documents also falls flat. [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, ¶¶79-83, [REDACTED]. Sensitive-data detection was equally known, including for agentless scanning, and is consistent with Veselov’s description of using conventional techniques. EX1400, ¶¶86-88; Pet., 39-40; EX1056, ¶¶38, 60-61, 66, 94; EX1078, ¶¶118, 181.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO's additional evidence is equally unconvincing. POR, 47. 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, ¶107. That agentless scanning involves cloud APIs, sensitive-data detection, and offline analysis is irrelevant since these too were known. EX2076, 11-12; EX2117, 1; [REDACTED] EX1400, ¶¶79-82, 86-88. Additional quotes similarly describe the unrecited/known features discussed above such as block-level analysis, connected assets [REDACTED]. EX2118, 4-5; [REDACTED] EX1400, ¶¶83-85.

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

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

actual copying, PO alleges “access and similarity,” but PO’s story has numerous flaws.

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

[REDACTED].

EX2074, ¶¶122-25; EX1402, 184:2-187:1. Nor does he allege mentioning snapshots during the meeting. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO's "access" accusations do not salvage its copying story. POR, 49-51 [REDACTED]

[REDACTED]

. 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, ¶¶119-20; EX1402, 113:12-115:13. [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 again outsources the analysis, but Dr. Kaeli's testimony does not suffice. POR, 54-56; EX2073, ¶¶232-55 ([REDACTED] not showing how analysis performed, and ignoring several limitations); EX1400, ¶¶121-22. [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; EX1400, ¶123.

Even if PO had shown copying, PO fails to prove nexus. PO does not establish the presumption and the allegedly copied features were known (or both known and unrecited). *Supra*, §§VI.A-B. [REDACTED]

[REDACTED], but this resource-discovery approach was commonplace. EX1400, ¶¶80-82, 124; EX1402, 144:18-145:9 [REDACTED]

[REDACTED] 157:20-159:15. PO's insistence that these types of standard cloud-API calls are not contemplated by Veselov—an Amazon patent by an AWS engineer (EX1007, Face; EX1127)—defies credulity. POR, 27; EX1400, ¶14. PO emphasizes offline scanning, block-level agentless

analysis, sensitive-data detection, and alerts, but these were known. Indeed, all are taught or consistent with Veselov. *Supra*, §§III.C; EX1400, ¶¶79-89, 124.

5. Commercial Success

PO fails to show commercial success, let alone nexus.

PO's startup financing evidence consists of self-interested statements and articles quoting such statements. POR, 58-60; *Bayer*, 713 F.3d at 1377. PO's bald assertion of a connection to cloud-API-based snapshot analysis is conclusory and unsupported. POR, 59-60; EX1400, ¶¶125-26. Regardless, these techniques were known. EX1400, ¶¶79-82.

PO's revenue arguments fail. PO does not establish a nexus presumption (*supra*, §VI.A), and PO's conclusory attribution of sales to the claims is facially insufficient. POR, 60-61; EX2074, ¶¶93-95; *In re Cree, Inc.*, 818 F.3d 694 (Fed. Cir. 2016). Regardless, the touted features were known and/or unrecited, as previously discussed. EX1400, ¶¶79-89, 126-27; *supra*, §VI.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, 60-61; *In re Huang*, 100 F.3d 135, 140 (Fed. Cir. 1996). Nor does PO discuss sales compared to 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]

[REDACTED]. Compare EX2076, 21 with EX2312.

[REDACTED]

[REDACTED]. EX2074, ¶16 [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, 61-62; *SightSound Techs., LLC v. Apple Inc.*, 809 F.3d 1307, 1319 (Fed. Cir. 2015). PO’s earlier argument that Wiz practices the claims falls short. *Supra*, §VI.B.4. PO takes credit for Wiz’s post-Nov-2022 growth but identifies no basis for that false claim. POR, 62. PO claims Wiz attributed its success to PO’s approach (POR, 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, ¶¶128-30. “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).

VII. CONCLUSION

For the above reasons, claims 1-22 are unpatentable and should be canceled.

Respectfully submitted,

Dated: July 15, 2025

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

VIII. 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 5598 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

IX. APPENDIX–PETITIONER’S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 11,663,031 to Shua
1002	Declaration of Dr. Angelos Stavrou
1003	Curriculum Vitae of Dr. Angelos Stavrou
1004	File History of U.S. Patent Application No. 17/400,364 ('031 Pat.)
1005	Scheduling Order (Dkt. No. 33), Orca security ltd. v. Wiz, Inc., No. 1:23cv-00758-GBW (DDE)
1006	Second Amended Complaint for Patent Infringement (Dkt. No. 15), Orca security ltd. v. Wiz, Inc., 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)
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

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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)
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

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	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
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

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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 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	Huseinović, "Virtual machine memory forensics," 2013 21st Telecommunications Forum Telfor (TELFOR) (2013)

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1050	IEEE Xplore webpage usage metrics for EX1049 (Huseinović)
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)
1056	U.S. Publication No. 2015/0033221 A1 to Chari
1057	"CWE-200: Information Exposure," archived on January 26, 2019, by the Internet Archive's "Wayback Machine" (https://web.archive.org/web/20190126150012/https://cwe.mitre.org/data/definitions/200.html)
1058	"CWE-311: Missing Encryption of Sensitive Data," archived on January 17, 2019, by the Internet Archive's "Wayback Machine" (https://web.archive.org/web/20190117150049/https://cwe.mitre.org/data/definitions/311.html)
1059	"CWE-359: Exposure of Private Information ('Privacy Violation')," archived on January 13, 2019, by the Internet Archive's "Wayback Machine" (https://web.archive.org/web/20190113052451/https://cwe.mitre.org/data/definitions/359.html)
1060	Declaration of Gordon MacPherson

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1061	García, “A Method for Malware Analysis by Virtual Machine Introspection Technique,” Res. Computer. Sci. 147, no. 12 (2018)
1062	Almulla, “Digital Forensic of a Cloud Based Snapshot,” 2016 Sixth International Conference on Innovative Computing Technology (INTECH), Dublin, Ireland (2016)
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
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)

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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
1079	Carroll, “Challenges in Modern Digital Investigative Analysis,” published in Forensic Science and Forensic Evidence I, U.S. Att’y’s 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”

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	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 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), Orca security ltd. v. Wiz, Inc., No. 1:23cv-00758-GBW (DDE)

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1118	Dr. Kaeli deposition exhibit of US Patent No. 10,834,050 (June 19, 2025)
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)

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1127	Veselov LinkedIn, https://www.linkedin.com/in/vladimir-veselov-2769753/details/experience/ (personal information redacted)
1128	Orca Security Ltd. v. Wiz, Inc., 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)
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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-releases/google-announces-agreement-to-acquire-wiz-302404500.html/

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Exhibit No.	Description
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]
1408	[REDACTED] [PROTECTIVE ORDER MATERIAL]

PROTECTIVE ORDER MATERIAL
CONFIDENTIAL - ATTORNEY'S EYES ONLY
REDACTED

Exhibit No.	Description
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:

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