Filed on behalf of: Orca Security Ltd.

Entered: October 3, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WIZ, INC.,
Petitioner,

v.

ORCA SECURITY LTD.,
Patent Owner.

IPR2024-01109
Patent 11,726,809

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 Sur-Reply to Petitioner's Reply ("Patent Owner's Sur-Reply") and Exhibits 2196 and 2197.[1] Good cause exists to seal these documents.

Patent Owner's Sur-Reply and Exhibits 2196 and 2197 are filed in opposition to Petitioner's Reply (Paper 43), which Petitioner filed concurrently with a Motion to Seal (Paper 44). In Petitioner's Motion to Seal (Paper 44), Petitioner stated that its Reply contained "information Patent Owner has 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 44, 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 33. *Id.* Finally, Petitioner stated that its Motion to Exclude Evidence contained "discussion of documents designated confidential by Patent Owner and previously filed under seal" and sought to maintain the protections of that information. *Id.*, 3.

Patent Owner's Sur-Reply discusses the same information that Petitioner sought to seal in its Motion to Seal (Paper 44), and accordingly, Patent Owner moves

[1] Patent Owner will file redacted copies of Patent Owner's Sur-Reply after conferring with Petitioner.

to seal Patent Owner's Sur-Reply; good cause exists to seal the information for the reasons presented in Petitioner's Motion to Seal (*id.*). Exhibits 2196 and 2197 likewise contain discussion of similar information that the parties have designated as confidential.

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

Respectfully submitted,

Dated: October 3, 2025

By: / Raghav Bajaj /

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 3rd day of October, 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:

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