

From: [Trials](#)
To: [Baillargeon, Joe](#); [Trials](#)
Cc: [Blake.Davis@lw.com](#); [Krissy.McKenna@lw.com](#); [Nicole.Bruner@lw.com](#); [doug.lumish@weil.com](#); [Rosato, Michael](#); [Derryberry, Wes](#); [Thomas, Tasha](#); [Argenti, Matthew](#); [Lauren.Rosen@lw.com](#); [Raghav.Bajaj@lw.com](#)
Subject: RE: IPR2024-01109, -01190, and -01191 Clerical Error Corrections
Date: Tuesday, October 28, 2025 4:22:17 PM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Counsel:

The board has expunged the papers below in accord with the parties' requests. The parties should review the record in each of the cases below and ensure that no additional papers need to be expunged and, if necessary, file any needed replacement papers.

-
IPR2024-00864

- Exhibit 1404

IPR2024-00865

- Exhibit 1127

IPR2024-01109, -01190, and -01191

- each of the Petitioner's Demonstratives (Exhibits 1417) that were filed in error on October 10th, 2025
- each of the Petitioner's replies filed on August 15, 2025

-
IPR2024-01190

- Exhibit 1121, filed August 15, 2025

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
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UNITED STATES
PATENT AND TRADEMARK OFFICE ®

From: Baillargeon, Joe <jbailargeon@wsgr.com>

Sent: Tuesday, October 21, 2025 6:11 PM

To: Trials <Trials@USPTO.GOV>

Cc: Blake.Davis@lw.com; Krissy.McKenna@lw.com; Nicole.Bruner@lw.com; doug.lumish@weil.com; Rosato, Michael <mrosato@wsgr.com>; Derryberry, Wes <wderryberry@wsgr.com>; Thomas, Tasha <tthomas@wsgr.com>; Argenti, Matthew <margenti@wsgr.com>; Lauren.Rosen@lw.com; Raghav.Bajaj@lw.com

Subject: RE: IPR2024-01109, -01190, and -01191 Clerical Error Corrections

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Dear Honorable Board,

In accordance with the Board's instructions during the oral hearing for IPR Nos. 2024-01109, -01190, and -01191 on October 14th, 2025:

- In each of IPR2024-01109, -01190, and -01191, Petitioner has filed a corrected version of Petitioner's Demonstratives (Exhibit 1417) and now respectfully requests the Board expunge each of the Petitioner's Demonstratives that were filed in error on October 10th, 2025.
- In each of IPR2024-01109, -01190, and -01191, a corrected version of Petitioner's reply has been filed and expungement of the replies that were inadvertently filed in error on August 15, 2025, is respectfully requested.
- In IPR2024-01190, Petitioner has filed a corrected version of Exhibit 1121 and now respectfully requests expungement of the Exhibit 1121 that was filed in error on August 15, 2025.

Respectfully,
Joe Baillargeon, Counsel for Petitioner

Best regards,



Joe Baillargeon | Attorney | Wilson Sonsini Goodrich & Rosati

1700 K Street NW, Fourth Floor | Washington, DC 20006 | jbailargeon@wsgr.com



Raghav.Bajaj@lw.com <Raghav.Bajaj@lw.com>

Sent: Friday, September 26, 2025 10:15 AM

To: Trials@USPTO.GOV

Cc: Blake.Davis@lw.com; Krissy.McKenna@lw.com; Nicole.Bruner@lw.com; doug.lumish@weil.com; Rosato, Michael <mrosato@wsgr.com>; Derryberry, Wes <wderryberry@wsgr.com>; Baillargeon, Joe <jbailargeon@wsgr.com>; Thomas, Tasha <tthomas@wsgr.com>; Argenti, Matthew <margenti@wsgr.com>; Lauren.Rosen@lw.com

From:

Subject: RE: IPR2024-00864, -00865

EXT - raghav.bajaj@lw.com

Dear Honorable Board,

To ensure the Board has a complete record for preparing the final written decisions in these proceedings, the parties are jointly following up on the below request to file corrected papers in IPR2024-00864 and IPR2024-00865.

Additionally, the parties jointly request authorization to file corrected papers in the related cases, IPR2024-01109, -01190, and -01191, as follows:

- In IPR2024-01109, Patent Owner requests leave to file a corrected Patent Owner Response, which was inadvertently filed without page numbers.
- In IPR2024-01109, Petitioner requests leave to file a corrected Exhibit 1121, as Exhibit 1120 was inadvertently filed as Exhibit 1121.
- In each of IPR2024-01109, -01190, and -01191, Petitioner requests leave to file corrected versions of the Replies, which were inadvertently filed without Protective Order Material labeling.

To the extent the Board wishes to discuss these issues with the parties, the parties are available at the Board's convenience.

Respectfully,

Matt Argenti, Counsel for Petitioner

Raghav Bajaj, Counsel for Patent Owner

Raghav Bajaj

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From: Bajaj, Raghav (ATX)

Sent: Tuesday, August 5, 2025 2:38 PM

To: 'Trials' <Trials@USPTO.GOV>

Cc: Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Henry, Christopher (BN) <Christopher.Henry@lw.com>; McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Bruner, Nicole (DC) <Nicole.Bruner@lw.com>; Rosato, Michael <mrosato@wsgr.com>; Derryberry, Wes <wderryberry@wsgr.com>; Baillargeon, Joe <jbailargeon@wsgr.com>; Thomas, Tasha <tthomas@wsgr.com>; 'Argenti, Matthew' <margenti@wsgr.com>; Bajaj, Raghav (ATX) <Raghav.Bajaj@lw.com>; Rosen, Lauren (LA) <Lauren.Rosen@lw.com>

Subject: IPR2024-00864, -00865

Dear Board,

The parties have conferred and jointly write to request authorization to correct errors made in the parties' respective papers in IPR2024-00864 and IPR2024-00865 to clarify the record.

Petitioner, Wiz, Inc., requests correction of inadvertent clerical mistakes made when filing the Replies to Patent Owner's Responses in IPR2024-00864 and -00865.

An incorrect version of IPR2024-00864, Exhibit 1404, and IPR2024-00865, Exhibit 1127, were inadvertently filed on July 15, 2025, with these Replies. Specifically, in IPR2024-00864 a duplicate copy of Exhibit 1405 was uploaded as Exhibit 1404, and in IPR2024-00865 a duplicate copy of Exhibit 1128 was uploaded as Exhibit 1127.

Accordingly, Petitioner requests authorization to file corrected versions of Exhibits 1404 and 1127 in IPR2024-00864 and -00865, respectively, and have the Board expunge the versions of the Exhibits 1404 and 1127 that were filed in error.

Patent Owner Orca Security, Ltd. requests correction of inadvertent citation errors in Patent Owner's Responses in IPR2024-00864 and -00865.

With respect to IPR2024-00864, Patent Owner's Response refers to the publication of a parent application of the '032 patent, US Patent Application Publication No. 2020/0244678 ("the '678 publication"), but inadvertently cites to Ex.2151 instead of Ex.2189, which was filed as an exhibit in related proceedings (e.g., IPR2024-01109). Patent Owner requests authorization to add Ex.2189 to IPR2024-00864 and file a corrected version of the Patent Owner's Response citing to Ex.2189.

Relatedly, with respect to IPR2024-00865, Patent Owner's Response cites to Ex.2151, but the citation is meant to refer to Ex.2189. Patent Owner requests authorization to add Ex.2189 to IPR2024-00865 and file a corrected version of the Patent Owner's Response citing to Ex.2189.

To the extent the Board wishes to discuss these issues with the parties, the parties are available at the Board's convenience.

Respectfully,

Matt Argenti, Counsel for Petitioner

Raghav Bajaj, Counsel for Patent Owner

Raghav Bajaj

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