

PROTECTIVE ORDER MATERIAL
REDACTED

Filed on behalf of: Wiz, Inc.

By: Matthew A. Argenti (margenti@wsgr.com)
Michael T. Rosato (mrosato@wsgr.com)
Wesley E. Derryberry (wderryberry@wsgr.com)
Tasha M. Thomas (tthomas@wsgr.com)
Joseph M. Baillargeon (jbailargeon@wsgr.com)
WILSON SONSINI GOODRICH & ROSATI

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 No. 11,726,809

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

PROTECTIVE ORDER MATERIAL
REDACTED

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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 to withstand scrutiny.

II. CLAIM CONSTRUCTION

A. “location”

PO does not dispute Wiz’s construction. Paper 30 (“POR”), 5-8. Moreover, PO’s expansive view of “location” as encompassing an identifier reinforces Wiz’s obviousness arguments. *Id.*, 60, 85; [REDACTED]
[REDACTED] EX1400, ¶9.

B. “analyzing the snapshot”

PO’s argument that the claims exclude Veselov’s instantiated assessment-VM approach is contradictory. POR, 6-8. PO does not explain contrary positions in its district-court complaint (Pet., 10; EX1006, 23, 57-58), claim-construction briefing (EX1117, 64 (“indirect analysis” of snapshot), 67-68 (POPR assertion not limiting)), and the specification/provisional (EX1001, 7:37-52; EX2149, 7-8 (¶22), 11 (¶43)). Dr. Kaeli testified that the specification identifies analyzing an

instantiated VM as an example of analyzing the snapshot. EX1401, 33:12-36:11; *see also* EX1402, 215:5-222:7 (refusing to address). PO argues a document describing “examin[ing] the VMs spun up from the snapshot” shows Wiz practicing this limitation. POR, 60-61 (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. Pet., 34-37; EX1400, ¶¶10-15.

III. GROUND 1

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

A. PO’s Attack on the Combination Fails

Wiz showed that Veselov and Mohanty consider comparable data, that the combination predictably applies Mohanty’s teachings to snapshot analysis, and that a POSA would have appreciated well-known benefits of the combination including enhanced assessment accuracy and useful prioritization. Pet., 22-24. In response, PO mischaracterizes the record and misapplies the law of obviousness.

PO fails to refute the references’ consideration of the same types of data. Leveraging its contradictory claim-construction position (*supra*, §II.B), PO claims Veselov’s 5A/B snapshot has only “basic information” compared to the 3A/B

approach. POR, 11-13 (arguing 5A/B snapshot lacks dynamic data and network properties). But Veselov states that the 3A/B and 5A/B snapshots are the “same.” EX1007, 16:56-67 (volume image 508 same as 308). Veselov’s previous descriptions similarly describe the snapshot used in both approaches as having the same content, including network-location information. EX1007, 3:20-4:4, 9:14-10:16; EX1400, ¶¶21-22. PO emphasizes additional ways to use network information in the 3A/B analysis phase, but the relevant data is stored in the snapshot. EX1007, 15:50-59 (snapshot taken during “capture period” includes VM activity/connections), 16:3-6 (snapshot captures traffic profile). The string/pattern comparison discussed for Figs. 5A/B is an example data-identification technique, not a comprehensive description of snapshot contents or assessment tasks. EX1007, 18:34-44; EX1400, ¶23. PO’s claim that snapshot-analysis capabilities were viewed as “rudimentary” relies on a competitor’s marketing. POR, 11-12; EX2106; EX1400, ¶21. Regardless, Veselov contradicts PO’s characterization. EX1007, 3:20-4:4 (results comparable to assessments performed on original VM), 10:1-16; *see also* EX1002, ¶¶54-58 (well-known out-of-VM analysis techniques); EX1400, ¶22. Dr. Kaeli lacks credibility since he was unable to identify the data agent-based scanners collect and was unfamiliar with their operation. Kaeli-Transcript, 15:16-24:10.

PO's teach-away arguments fail. PO claims Mohanty's background discussion of continuous assessments disparages Veselov's snapshot-based assessments. POR, 14. But Mohanty refers to a "snapshot **of a vulnerability assessment report**," not VM/disk snapshots. EX1075, 1:7-22 (emphasis added); EX1400, ¶17. Nor does Mohanty otherwise disparage Veselov's approach, which is reasonably current and continuous. EX1007, 4:1-18 (periodic assessments), 6:25-49 (on-demand assessments), 8:62-9:25 (fresh snapshots); EX1400, ¶¶16-17, 27. Veselov's approach also has its own advantages, and the applied teachings provide further benefits. Pet., 21-25; EX1007, 2:42-4:4; EX1400, ¶17; *Medichem, S.A. v. Rolabo, S.L.*, 437 F.3d 1157, 1165-67 (Fed. Cir. 2006) (POSA considers benefits gained and lost); *In re Urbanski*, 809 F.3d 1237, 1243-44 (Fed. Cir. 2016) (reasonable to pursue one benefit at expense of another). PO claims the combination is contrary to Veselov's complexity comment. POR, 15-16. But the cited passage addresses agent installation/monitoring, which the combination does not propose. EX1007, 2:42-3:19; EX1400, ¶¶19, 22. The actual combination is not overly complex, and Veselov encourages using a variety of assessment techniques. EX1007, 2:35-41; EX1400, ¶22.

PO's complaint of insufficient implementation details lacks merit. PO claims Wiz did not explain how to use agent-based techniques with snapshots. POR, 14-16, 17-18. First, Mohanty is not limited to agents. EX1400, ¶¶18-19

(citing, *inter alia*, EX1040; EX1139; EX1140); *see also* EX1415 (“Kaeli-Transcript”), 8:14-22 (Qualys and Rapid7 are “examples”), 10:3-11:11 (POSA familiar with non-agent-based scanners). Regardless, PO incorrectly assumes bodily incorporation of agents. POR, 15 (assuming modification of Veselov to “interact with the VM”), 17-18 (cannot use agent in snapshot). That is not the test, nor did Wiz propose it. *In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012); Pet., 22-23; EX1002, ¶111. PO claims Wiz did not explain how Veselov would gather the data (POR, 14-15), but Wiz explained the comparable data available in snapshots and Veselov’s processes for collecting it. Pet., 22-25, 34-36; EX1002, ¶¶109-16, 148-52; EX1007, 3:61-4:4, 8:30-45, 9:55-67, 17:9-29 (analyze mounted volume image like disk drive), 18:32-53 (data identification via string/pattern comparison); *see also* Kaeli-Transcript, 21:11-19 (“String comparison is performed in...many applications.”).

PO’s prioritization arguments fail. PO claims snapshot-based assessments do not identify issues of varying importance. POR, 16-17. But Veselov explains that it “produces the results that the scanning system otherwise would have obtained if the security assessment were performed on the original virtual machine instance.” EX1007, 3:20-4:4; EX1400, ¶27. PO questions whether snapshots provide sufficient information for prioritization (POR, 16), but as explained above, Wiz showed they contain the same types of information used by Mohanty. Pet.,

22-25, 34-35, 38-39; EX1400, ¶¶20, 27-28. PO disputes the relevance of prioritization when analyzing snapshots “gathered in the past” (POR, 17), but prioritization was known to be useful in snapshot/image-based scanning. Pet., 22-24; EX1002, ¶¶56-58, 67, 114-15; EX1048, ¶43; EX1078, ¶¶149, 154, 180-83; EX1400, ¶¶25, 82-83. Moreover, Veselov’s assessment is reasonably current since it may be performed regularly or on-demand and may use fresh snapshots. EX1007, 4:1-18, 6:25-49, 8:62-9:25; EX1400, ¶27.

PO’s attack on *KSR* fails. Wiz showed that arriving at the claims merely involved using known elements according to their known function to achieve predictable results. Pet., 22 (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. PO treats corroboration of the POSA’s knowledge and the applied teachings’ routine, predictable nature as indicative of hindsight (*id.*, 18-19), which is contrary to *KSR*. 550 U.S. at 416; EX1400, ¶¶24-25, 36.

PO fails to rebut reasonable expectation of success. PO claims Wiz did not show that determining an asset’s network location was routine for snapshot-based assessments. POR, 19. As explained above, however, Wiz showed that Veselov’s snapshot includes readily accessible network-location information. Pet., 22-23, 38-39; EX1007, 9:42-67 (snapshot includes “configurations of network protocols and services; properties of connections to other computing resources ... and the like”).

The cited testimony attacks a bodily-incorporation strawman. Kaeli-Dec, ¶¶100-05 (“[I]t is not possible to install an agent on a snapshot.”). PO claims agents use their own location but cites no support. POR, 19. Regardless, one possible data-collection technique for agents would not undermine Wiz’s showing that determining network location was routine in snapshot-based assessments. PO argues that a virtual asset’s physical device/address may change. POR, 19 (citing EX1007, 2:67-3:5). But the claims are not limited to physical device/address. *See* Kaeli-Transcript, 30:13-34:1. Nor does this basic virtualization feature undermine the predictable use of snapshot data to assess network location, especially given Veselov’s description of network-location information in fresh snapshots. EX1400, ¶¶27-30.

B. The Combination Satisfies the Claims

1. Elements 1.5-1.7/16.5-16.7/19.5-19.7

PO mischaracterizes Veselov and attacks the references individually. PO acknowledges that the 3A/B snapshot includes network-location information but claims the 5A/B snapshot is more limited. POR, 21-22. First, this relies on PO’s contradictory claim-construction argument. *Supra*, §II.B; EX1400, ¶¶11-15. Regardless, Veselov teaches that the 3A/B and 5A/B snapshots are the same. EX1007, 3:20-4:4, 9:42-10:16, 15:50-59 (snapshot taken during “capture period” includes VM activity/connections), 16:56-67 (volume image 508 same as 308);

EX1400, ¶¶31-34; *supra*, §III.A. Mohanty also provides reasons to include network-location information. Pet., 38-42; EX1400, ¶35.

For the combined teachings, PO repeats its flawed attack on the rationale. EX1400, ¶¶35-37. PO argues that Wiz does not explain how Veselov would use Mohanty's contextual tags to determine network location. POR, 22-23. But this assumes bodily incorporation and ignores Wiz's showing that Veselov's snapshot contains network-location information. *Supra*, §III.A; Pet., 38-39; EX1400, ¶35.

2. Elements 1.8/16.8/19.8

PO attacks Veselov individually and repeats its rationale arguments. Neither has merit.

PO's arguments against Veselov fail. PO claims Veselov reports results, not alerts. POR, 24. But verbatim claim-term use 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., 43; 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, ¶¶38-39; Kaeli, ¶124 (alerts "inform stakeholders of a situation that needs attention"); *see also* EX1401, 95:3-108:12 (unable to identify content requirement for "alert").

PO's attack on the combination fails. PO claims Wiz did not explain the combination. POR, 25-26. Again, however, Wiz showed that Mohanty's techniques have their same predictable operation here. *Supra*, §III.A; Pet., 22-25; EX1002, ¶¶110, 115-16. PO argues that Mohanty uses agents. POR, 25-26. But Mohanty is not limited to agents, and regardless, Wiz showed that the references consider the same types of vulnerabilities and underlying data. *Supra*, §III.A. The process used to collect this data is orthogonal to the subsequent analysis and reporting. EX1002, ¶¶115-16; EX1400, ¶40. PO stresses that Mohanty detects vulnerabilities in real time, whereas Veselov uses "point in time" snapshots (POR, 25-26), but prioritized alerts are equally useful in Veselov's reasonably current snapshot assessments. EX1007, 4:1-18, 8:62-9:25; EX1400, ¶¶40-41. PO claims its secondary-considerations evidence refutes Wiz's showing that communicating scores/rankings was commonplace (POR, 26), but PO's evidence fails for numerous reasons. *Infra*, §VI.

3. Claims 15/22

Wiz showed that Veselov teaches or suggests the recited querying of the cloud management console ("CMC") "for the location of the snapshot and the location of the virtual disk." Pet., 60-64. In response, PO deflects.

PO's cloud argument fails. PO claims Wiz admitted the 5A/B embodiments do not involve a "cloud" provider (POR, 27), but Wiz showed the opposite. Pet.,

26, 60-61; EX1002, ¶¶91, 245-47; EX1007, 2:22-3:19 (cloud applicability); EX1400, ¶¶42-44 (citing EX1118-1120); EX1401, 38:17-50:12 (discussing EX1118-1120 and admitting Veselov’s “service provider” refers to cloud provider).

PO’s arguments addressing “virtual disk” location fail. The petition presented several independent arguments for this aspect: (1) the previously discussed querying for the snapshot’s location satisfies this because Veselov teaches/suggests a snapshot and virtual disk having the same general location, (2) Veselov teaches/suggests querying the virtual-disk location as part of the assessment configuration (e.g., selecting a particular virtual disk for the snapshot), and (3) it was obvious as part of the mitigation process. Pet., 63-64. PO responds with mischaracterization and strawmen.

PO mischaracterizes the record. PO claims Wiz conceded that Veselov lacks virtual-disk-location queries (POR, 27), but Wiz showed the opposite. Pet., 63-64. PO claims Wiz argued that such querying was obvious simply because the user’s initial request can identify a target VM (POR, 27-28), but the scan request was just the starting point of Wiz’s analysis. Pet., 60-64. PO claims the user already knows the location of the VM and its components because the request can identify the VM. POR, 27-28. But this non sequitur conflates the VM’s identity

with the virtual disk's location. Regardless, VM identification in the request is optional. EX1007, 6:34-38; EX1400, ¶49.

PO attacks strawmen. PO argues that the limitation is not “inherent” because Veselov says the snapshot can be “obtained.” POR, 27. But Wiz did not rely on inherency. Pet., 60-64; EX1400, ¶¶45-46. PO claims Wiz's point involving the snapshot's/disk's general location is inherency because it supposedly relies “exclusively” on figures. POR, 28-29. But Wiz cited other evidence and explained what Veselov suggests to a POSA. Pet., 63-64 (citing, *inter alia*, EX1002, ¶250); Pet., 55-56. PO claims snapshots in Figure 1 are located in a separate storage service and snapshots in other figures are read by a hypervisor. POR, 29. But the storage service is optional (EX1007, 5:1-22), and hypervisors and cloud APIs are not mutually exclusive. EX1400, ¶¶45, 48. PO argues that locating a VM does not necessarily locate its disks. POR, 28. But Wiz did not rely on inherency here either (Pet., 62-64), and the general locations of VMs and their disks are not typically different. EX1400, ¶¶48-49 (citing EX1133). PO's “could vs. would” arguments are also strawmen since Wiz explained what Veselov's process suggests to a POSA, not a modification. POR, 28-29; Pet., 62-64; *Janssen Pharms., Inc. v. Teva Pharms. USA, Inc.*, 97 F.4th 915, 928 (Fed. Cir. 2024) (references read from POSA's perspective for all they fairly suggest); EX1400, ¶¶50-53.

PO's secondary-consideration arguments fail. PO says disk-locating was commercially important (POR, 30) but does not prove commercial success or nexus. *Infra*, §§VI.A, VI.B.5; EX1400, ¶¶68-75, 122-25. Moreover, the supposedly important location is not what PO later identifies as the location. *Compare* POR, 30 (emphasizing physical storage location) *with id.*, 35 (snapshotId). PO also fails to prove copying. *Infra*, §§VI.A, VI.B.4; EX1400, ¶¶106-21.

IV. GROUND 2

PO's arguments are moot. Ground 2 presents backup arguments for aspects of element 1.8, claim 6/17, and claim 7/18. Pet., 65, 68-71. However, PO does not dispute that the Ground-1 combination, if made, teaches the relevant aspects. For element 1.8, the petition discusses Czarny's teachings of additional reasons to report risk information, but PO does not dispute that Mohanty teaches reporting risk information. POR, 25-26. Nor does PO address claims 6-7 in Ground 1.

Regardless, PO's arguments fail. EX1400, ¶¶54-58. PO argues that Czarny does not analyze snapshots and that Czarny's asset-level risk is not the asset's risk "to the cloud computing environment." POR, 69-70. But this does not address how the teachings are applied in the combination. Pet., 34-37, 40-42. PO alleges insufficient explanation of how the combination would use binary data (POR, 69), but Wiz showed that Veselov's snapshots includes the same underlying disk data

(e.g., files, applications, etc.). Pet., 22-23, 65-66; EX1007, 703:20-4:4 (snapshot may include “block-level image of the entire logical volume”), 9:42-67; EX1400, ¶¶55-56. PO claims Czarny assesses risk in a different context—i.e., determining whether to grant access to a secure environment (POR, 69-70)—but ignores Wiz’s showing that reporting risk levels was similarly applicable and beneficial to snapshot-based assessments. Pet., 66-68. EX1400, ¶57.

V. GROUNDS 3-4

PO’s arguments fail. EX1400, ¶¶59-62. PO claims Wiz did not explain why a POSA would have looked to Hutchins or applied its quarantine teachings to snapshot analysis (POR, 70-72), but this ignores Wiz’s analogous-art showing and multiple motivating factors. Pet., 71-73. PO argues that Hutchins scans for viruses, which are distinct from vulnerabilities, and that Czarny describes vulnerability detection and malware detection as different fields. POR, 71. But malware was commonly viewed as a vulnerability, and Czarny notes overlapping security concerns. EX1084, 1:5-35; EX1400, ¶¶60-62 (citing EX1078, ¶93). PO itself characterizes vulnerabilities broadly. EX2176. Regardless, PO’s virus arguments do not address the applicability of Hutchins’ *quarantine* teachings. Pet., 71-73. PO claims Czarny refutes the applicability of quarantining to vulnerability assessments. POR, 71-72. But PO omits Czarny’s express teaching that quarantining is the appropriate response to detecting vulnerabilities in some

situations. EX1084, 1:5-35; EX1400, ¶¶61-62. PO argues that Hutchins analyzes instantiated VMs, not snapshots (POR, 72), but this assumes bodily incorporation of Hutchins' analysis process and attacks the references individually. EX1400, ¶60.

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). Because PO does not allege entitlement to a presumption of nexus, PO 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, 36-38; *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, Paper 33, 33 (precedential) (no presumption where patentee did not analyze coextensiveness).

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 asset's virtual disk, yet PO emphasizes automatically enumerating "every asset" in the "control plane path." EX2067, 8-9; [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The claims determine

"vulnerabilities," yet [REDACTED]

[REDACTED]

. EX2067, 9-10; [REDACTED]

[REDACTED]

; EX1400, ¶¶63-72; [REDACTED]

[REDACTED]

[REDACTED].

[REDACTED]

[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 ’809 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; IPR2024-00864, Paper 32 (“032-POR”), 31-61; IPR2024-00865, Paper 32, 34-62; IPR2024-01190, Paper 28, 33-62; IPR2024-01191, Paper 29, 33-65.

PO also fails to meet its burden for the “embodiment” requirement. PO provides no meaningful explanation for elements 1.5-1.7, a wholly conclusory assertion for element 1.8, and a single sentence for all dependent claims. POR, 60-62; *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. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The mappings for elements 1.7-1.8 (prioritizing “by the determined risk” and reporting vulnerabilities as alerts prioritized “according to the determined risk”) are also inconsistent. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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.*, 140 F.4th 1351, 1360-61 (Fed. Cir. 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 it was known. *E.g.*, EX1002, ¶¶57, 88-89; EX1040, Abstract, ¶¶8-12, 23, 43-48, 52; EX1073, 1; EX1400, ¶¶76-77. PO cites cases involving secondary-considerations evidence tied to inventive combinations

of features (POR, 30-31), but no evidence indicates that PO's use of common techniques in agentless scans was innovative.¹ To the contrary, the evidence shows that all touted features were known for agentless scanning. Cloud APIs were the backbone of cloud-security platforms, including agentless scanning. EX1400, ¶78 (citing EX1020, 21:9-43; EX1053, ¶¶79-94); *see also* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] PO emphasizes its prioritization based on whether the asset is Internet-facing, but this was commonplace, as Mohanty itself shows. POR, 37; EX1400, ¶82 (citing EX1078, ¶¶111, 117); EX1075, 5:16-41. The other touted features were similarly known for API-based agentless

¹ PO disregards evidence that the touted features were known because Wiz argued obviousness rather than anticipation (POR, 31), but patentees cannot prove nexus simply by arguing lack of anticipation. *See Janssen*, 97 F.4th at 935. Indeed, this inquiry only arises in the obviousness context, so PO's position would largely nullify the nexus requirement.

scanning. EX1400, ¶¶76-87. PO also touts additional 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. POR, 56-59. Both fall flat.

PO’s emphasizes agents’ limitations, but the alleged solution—agentless scanning—was known. POR, 32-34; *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, ¶¶77, 88. There is little daylight between the touted features and Veselov. EX1400, ¶¶87, 89-90; *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”).

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, 31-34 (citing Shua-Dec, ¶¶84-94; EX1001; EX2082-2083; EX2099-2100); [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-Dec, ¶¶90-92 (companies “disagreed” that network/agent-based scanners were inadequate); EX1400, ¶91.

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, 34 (citing Shua-Dec, ¶¶94-95, 14-25). 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, ¶¶91-92. 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. [REDACTED]

2. Skepticism

PO does not prove skepticism with nexus. Most evidence relates exclusively to “agentless” scanning, but this unrecited aspect was known. POR, 39-40; EX2076, 7-9, 11; EX2106, 1; [REDACTED]; EX1400, ¶¶77, 93-96. [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”); EX1400, ¶95. Dr. Kaeli offers a conclusory assertion (Kaeli-Dec, ¶¶176-81), and Mr. Shua’s self-interested testimony is equally unhelpful (Shua-Dec, ¶¶95-97).

3. Praise

PO’s “praise” evidence largely consists of self-interested statements, which are not relevant praise. *Bayer*, 713 F.3d at 1377. Many are PO’s press releases (EX2121-2122; EX2124-2125; EX2128-2130; EX2132) or self-interested marketing from investors/partners. *E.g.*, EX2117; EX1400, ¶¶98-99. Several so-called “awards” were sponsored by PO’s investors, and PO commissioned the TAG Security Report (EX2118). EX1402, 173:7-184:1 (admitting relationships); EX1400, ¶100 (citing EX2113; EX2129-2131; EX2145). 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 nexus. *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, 41-43; EX1400, ¶¶101-02. Quoted statements relate exclusively to known/unrecited features such as the “agentless approach”

(EX2123, 1-2) and scanning “every discovered asset” (EX2119, 6-7). EX1400, ¶¶70, 101-02; *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, ¶¶77-81, 87, 105.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO’s additional evidence is equally unconvincing. POR, 44-45. 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. That agentless scanning uses cloud APIs is

irrelevant since that too was known. EX2076, 11-12; EX1400, ¶¶77-80.

Additional quotes similarly describe the unrecited/known features discussed above such as block-level analysis, connected assets, [REDACTED]. EX2118, 4-5; [REDACTED] EX1400, ¶¶82-87.

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.² With no evidence of actual copying, PO alleges "access and similarity," but PO's story has numerous flaws.

PO's copying story does not withstand scrutiny. Mr. Shua says he told a Wiz founder about agentless scanning in May 2019, but he [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

² To the contrary, it is PO who has aggressively and systematically copied Wiz. EX1128, 42-50.

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO's "access" accusations do not salvage its copying story. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

But market monitoring—a standard competitive practice—is not indicative of copying patents/products. *Wm. Wrigley Jr. Co. v. Cadbury Adams USA LLC*, 683 F.3d 1356 (Fed. Cir. 2012); EX1400, ¶117; EX1402, 113:12-115:13 (admitting checking competitor websites). [REDACTED]

[REDACTED] see also EX1128, 41 (counterclaim ¶¶14-15). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Regardless, PO fails to prove substantial similarity. PO alleges Wiz practices the claims like PO, but PO outsources the analysis. POR, 60-62. That testimony fails anyway since, for example, it does not explain why [REDACTED] is the recited location, show how the analysis step is performed, or meaningfully discuss elements 1.5-1.8. *Id.* Kaeli-Dec, ¶¶225-38; EX1400, ¶118. [REDACTED]

[REDACTED]

[REDACTED]

[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, ¶120.

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; EX1400, ¶121. As shown above, the referenced features—e.g., cloud APIs, read-only access, using “block storage level” analysis, and prioritized alerts—were known in agentless scanning. *Supra*, §§III.B, VI.B; EX1400, ¶¶77-87.

5. Commercial Success

PO fails to show commercial success, let alone nexus.

PO's financing evidence consists of self-interested statements and articles quoting such statements. POR, 64-66; *Bayer*, 713 F.3d at 1377; EX1400, ¶¶122,

124. The alleged connection to the claims is conclusory and unsupported. POR, 64-65; EX1400, ¶123. Regardless, the self-interested quotes exclusively address known features such as analyzing VMs, APIs, context-awareness, and targeted alerts with remediation recommendations. EX1400, ¶¶77-87.

PO's revenue arguments fail. PO cites sales but does not establish a nexus presumption. POR, 66-67; *supra*, §VI.A; EX1400, ¶123. PO claims it would have earned more without competition from Wiz but only cites Mr. Shua's self-interested speculation. POR, 67; Shua-Dec, ¶114.

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, 66-67; *In re Huang*, 100 F.3d 135, 140 (Fed. Cir. 1996). Nor does PO discuss sales compared to the 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). PO's own evidence shows minimal market share (even setting aside the exhibit's apparent inflation of PO's annual revenue). *Compare* EX2076, 21 *with* EX2312. Mr. Shua also effectively admits to deterring others from pursuing agentless scanning. Shua-Dec, ¶16 (patent coverage emphasized in marketing/presentations); *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, 67; *SightSound Techs., LLC v. Apple Inc.*, 809 F.3d 1307, 1319 (Fed. Cir. 2015). PO alleges infringement (POR, 67), but PO's earlier argument that Wiz practices the claims falls short. *Supra*, §VI.B.4. PO claims Wiz attributed its success to PO's approach (POR, 67), but PO's evidence says that "Wiz's true strength" was not agentless scanning but rather meeting customers' evolving needs. EX2076, 7-8; EX1400, ¶¶125-27. "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 1-23 are unpatentable and should be canceled.

Respectfully submitted,

Dated: August 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 5589 words, excluding the parts of the brief exempted by 37 C.F.R. §42.24(c).

Dated: August 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. 11,726,809 to Shua
1002	Declaration of Dr. Angelos Stavrou
1003	<i>Curriculum Vitae</i> of Dr. Angelos Stavrou
1004	File History of U.S. Patent Application No. 18/055,201 ('809 Pat.)
1005	Scheduling Order (Dkt. No. 33), <i>Orca security ltd. v. Wiz, Inc., No. 1:23cv-00758-GBW (DDE)</i>
1006	Second Amended Complaint for Patent Infringement (Dkt. No. 15), <i>Orca security ltd. v. Wiz, Inc., No. 1:23cv-00758-GBW (DDE)</i>
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 5 th 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: 4 th USENIX Symposium on Networked Systems Design & Implementation, USENIX
1014	Klemperer, “Efficient Hypervisor Based Malware Detection,” Carnegie Mellon University (May 2015)

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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 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)

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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
1037	Bauman, “A Survey on Hypervisor-Based Monitoring: Approaches, Applications, and Evolutions,” ACM Computing Surveys, Vol. 48, No. 1, Article 10 (Aug. 2015)

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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	Huseinovic–VM Memory Forensics.
1050	Intentionally Left Blank
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)

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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	Archived copy of “CWE-200: Information Exposure,” published by MITRE and 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	Archived copy of “CWE-311: Missing Encryption of Sensitive Data,” published by MITRE and 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	Archived copy of “CWE-359: Exposure of Private Information (‘Privacy Violation’),” published by MITRE and 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	Intentionally Left Blank
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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

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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)
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’ys Bull. Vol. 65 No. 1 (January 2017)
1080	U.S. Patent No. 7,831,739 B2 to Lambeth

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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	Amended Scheduling Order (Dkt. No. 90), <i>Orca security ltd. v. Wiz, Inc., No. 1:23cv-00758-GBW (DDE)</i>
1084	U.S. Patent No. 9,749,349 B2 to Czarny
1085	U.S. Publication No. 2017/0048266 A1 to Hovor
1086	Guide to Effective Remediation of Network Vulnerabilities, Qualys, Inc. (2004) https://cdn2.qualys.com/docs/mktg/guide_vulnerability_management.pdf
1087	Archived copy of “Vulnerability Management and Scanning: Monitor networks to keep vulnerabilities in check,” published by Rapid7 and archived on July 28, 2018, by the Internet Archive’s “Wayback Machine” https://web.archive.org/web/20180728052753/www.rapid7.com/fundamentals/vulnerability-management-and-scanning/
1088	Archived copy of “Vulnerability Details : CVE-2004-1137,” published by CVE Details and archived on July 15, 2017, by the Internet Archive’s “Wayback Machine” https://web.archive.org/web/20170715131548/https://www.cvedetails.com/cve/CVE-2004-1137/
1089	Archived copy of “Vulnerability Details : CVE-2004-1145,” published by CVE Details and archived on June 3, 2016, by the Internet Archive’s “Wayback Machine” https://web.archive.org/web/20160603172731/https://www.cvedetails.com/cve/CVE-2004-1145/ .

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1091	Archived copy of “Vulnerability Details : CVE-2007-0018,” published by CVE Details and archived on August 9, 2014, by the Internet Archive’s “Wayback Machine” https://web.archive.org/web/20140809144720/https://www.cvedetails.com/cve/CVE-2007-0018/ .
1092	Federal Information Processing Standards Publication 180-4, “Secure Hash Standard (SHS),” NIST (August 2015) https://nvlpubs.nist.gov/nistpubs/FIPS/NIST.FIPS.180-4.pdf .
1093	<i>Orca Security Ltd., v. Wiz, Inc.</i> , C.A. No. 23-758-JLH – Doc. 170 Wiz, Inc.’s Stipulation Concerning Invalidity Grounds (October 10, 2024)
1094	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]
1095	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” https://web.archive.org/web/20181103234309/https://kar.kent.ac.uk/37627/1/a4-bourquin.pdf [served, not filed]
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1097	Supplemental Declaration of Dr. Angelos Stavrou [served, not filed]
1098-1111	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)
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)

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Exhibit No.	Description
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)
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)

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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)
1132	Creating an Amazon EBS-Backed Linux AMI, https://web.archive.org/web20170601003305/https://docs.aws.amazon.com/AWSEC2/latest/UserGuide/creating-an-ami-ebs.html , Amazon Web Services, Inc. (2017)
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/
1138	“Security Audit” Reference Guide by Amazon https://docs.aws.amazon.com/aws-managed-policy/latest/reference/SecurityAudit.html)
1139	Scarfone et al., “Technical Guide to Information Security Testing and Assessment: Recommendations of the National Institute of Standards and Technology,” NIST Special Publication 800-115 (Sep. 2008), https://doi.org/10.6028/NIST.SP.800-115

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Exhibit No.	Description
1140	“Vuls: Agentless Vulnerability Scanner for Linux/FreeBSD,” archived on September 1, 2018, by the Internet Archive’s “Wayback Machine” (https://web.archive.org/web/20180901153521/https://vuls.io)
1141	Rapid7 Research, “Quarterly Threat Report: Q3 2018” (Nov. 13, 2018), https://www.rapid7.com/globalassets/_pdfs/research/rapid7-threat-report-2018q3.pdf
1142-1399	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]

PROTECTIVE ORDER MATERIAL
REDACTED

Exhibit No.	Description
1408	[REDACTED] [PROTECTIVE ORDER MATERIAL]
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]
1415	[REDACTED] [PROTECTIVE ORDER MATERIAL]

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Petitioner's Reply to Patent Owner's Response and Exhibits 1114 – 1129, 1131 – 1141 and 1400 - 1415 were served on August 15, 2025, at the following electronic service addresses:

Christopher Henry
Raghav Bajaj
Kristina McKenna
Douglas E. Lumish
Blake R. Davis
Steven W. Peters
Lucas Lonergan
Nicole E. Bruner
Latham & Watkins LLP
christopher.henry@lw.com
raghav.bajaj@lw.com
krissy.mckenna@lw.com
doug.lumish@lw.com
blake.davis@lw.com
steven.peters@lw.com
lucas.lonergan@lw.com
nicole.bruner@lw.com

Dated: August 15, 2025

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