Filed on behalf of: Orca Security Ltd.

Entered: March 11, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WIZ, INC.,
Petitioner,

v.

ORCA SECURITY LTD.,
Patent Owner.

IPR2024-01190
U.S. Patent 11,740,926 B2

PATENT OWNER'S UPDATED EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Orca Security Ltd. respectfully submits the following current exhibit list:

Exhibit	Description
2001	Declaration of David R. Kaeli, Ph.D. ("Kaeli Decl.")
2002	*Curriculum Vitae* of David R. Kaeli, Ph.D.
2003	Trend Micro™ | **vm**ware®, *Trend Micro Enterprise Security: Changing the Game for Anti-Virus in the Virtual Datacenter* (White Paper) (Sept. 2010), https://www.kennisportal.com/wp-content/uploads/2022/06/ChangingtheGameintheVirtualDatacenter.pdf (last visited Sept. 7, 2024) ("vmware, *Trend Micro Enterprise Security*")
2004	Red Hat, *Red Hat Virtualization 4.0: Technical Reference: The Technical Architecture of Red Hat Virtualization Environments* (updated Mar. 29, 2018), https://docs.redhat.com/en-us/documentation/red_hat_virtualization/4.0/pdf/technical_reference/Red_Hat_Virtualization-4.0-Technical_Reference-en-US.pdf ("Red Hat Virtualization 4.0")
2005	RESERVED
2006	*Virtual Machine Snapshots*, *Red Hat Virtualization 4.3: Technical Reference: The Technical Architecture of Red Hat Virtualization Environments* (updated Apr. 20, 2020), https://docs.redhat.com/en-us/documentation/red_hat_virtualization/4.3/pdf/technical_reference/Red_Hat_Virtualization-4.3-Technical_Reference-en-US.pdf (excerpt) ("Red Hat Virtualization 4.3 – *Virtual Machine Snapshots*")
2007	Dominik Birk, *Technical Challenges of Forensic Investigations in Cloud Computing Environments* (Jan. 12, 2011), https://cachin.com/cc/csc2011/submissions/birk.pdf (last visited Sept. 7, 2024) ("Birk, *Technical Challenges*")
2008-2009	RESERVED

Exhibit	Description
2010	U.S. Pat. No. 9,467,465 B2 ("Hibbert")
2011	U.S. Pat. No. 10,298,599 B1 ("Zhang")
2012	U.S. Pat. No. 9,594,912 B1 ("Thioux")
2013	RESERVED
2014	Complaint for Patent Infringement, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. July 12, 2023), ECF No. 1 ("Orca Compl.")
2015	Oral Order (Joint Motion for Discovery Dispute Teleconference), *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. May 17, 2024), ECF No. 62 ("Oral Order")
2016	Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024) (excerpt) ("Pet'r's Invalidity Contentions")
2017	RESERVED
2018	Abraham Silberschatz et al., *Operating System Concepts* (9th ed. 2013) (excerpt)
2019	Derek Uluski, Real Time Anti-Virus for a Virtualized Environment (2008) (M.S.E.E., Thesis, Northeastern University) (excerpt) ("Uluski Thesis")
2020	RESERVED
2021	Amazon Web Service (AWS), *What Is a Hypervisor?* (2024), https://aws.amazon.com/what-is/hypervisor/ (last visited Sept. 11, 2024)
2022	Diego Perez-Botero et al., *Characterizing Hypervisor Vulnerabilities in Cloud Computing Servers*, Conference: Proceedings of the Workshop on Security in Cloud Computing (SCC), Hangzhou, China 1–8 (May 8, 2013) ("Perez-Botero, *Characterizing Hypervisor Vulnerabilities*")

Exhibit	Description
2023-2025	RESERVED
2026	Greg Zemlin, *Agentless vs. Agent-Based Security: Which is Better for the Cloud?*, Wiz (Nov. 26, 2023), https://www.wiz.io/academy/agentless-vs-agent-based-security ("Wiz Marketing")
2027-2039	RESERVED
2040	Stipulation and Order, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 25, 2024) ("Amended Scheduling Order")
2041-2042	RESERVED
2043	Pallavi Vishwakarma, *Agent-Based Vs Network Based Internal Vulnerability Scanning*, SecOps Solution.com (July 2, 2023)
2044	*Agentless vs Agent-Based Scanning: A Comparative Analysis*, Runecast.com (July 20, 2023)
2045	Joint Claim Construction Chart, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Sept. 25, 2024) ("Jt. Claim Constr. Chart")
2046	Appendix E, Invalidity of United States Patent 11,740,926 (the "'926 Patent"), attached to Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024)
2047	Appendix E-1, Invalidity of United States Patent 11,740,926 (the "'926 Patent"), attached to Defendant Wiz, Inc.'s Initial Invalidity Contentions, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. June 7, 2024)
2048	Wiz, Inc.'s Answering Claim Construction Brief, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Oct. 22, 2024) (excerpt) ("Answering Claim Constr. Chart")
2049	Declaration of Douglas E. Lumish Pursuant to 37 C.F.R. § 42.10(c)(2)

Exhibit	Description
2050	Declaration of Steven W. Peters In Response to Petitioner's First Objections to Evidence [*served, not filed*]
2051-2052	RESERVED
2053	Listing of Requested Documents
2054	RESERVED
2055	RESERVED
2056	Orca Security Ltd.'s Eleventh Supplemental Responses and Objections to Defendant Wiz's First Set of Interrogatories, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Dec. 13, 2024) (excerpts)
2057	Stipulated Protective Order, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Mar. 15, 2024), ECF No. 38
2058	Email exchange between counsel for Wiz, Inc. and counsel for Orca Security Ltd. (Dec. 17-26, 2024)
2059	Email exchange between counsel for Wiz, Inc. and counsel for Orca Security Ltd. (Dec. 23, 2024 – Feb. 25, 2025)
2060-2064	RESERVED
2065	*Orca Security Lands $6.5M Seed Round to Deliver IT Security Teams Unprecedented Full Stack Cloud Visibility, Securing High-Velocity Cloud Growth,* Orca Security Blog (June 12, 2019), https://orca.security/resources/blog/orca-security-lands-6-5m-seed-round-to-deliver-it-security-teams-unprecedented-full-stack-cloud-visibility-securing-high-velocity-cloud-growth/
2066	Orca Security, *The Ultimate Guide to: Gaining Full Stack Visibility Into Your Cloud Assets* (Nov. 2019)
2067	Orca Security Technical Brief, *SideScanning™ – Inside the Engine that Powers Orca Security* (2020)

Exhibit	Description
2068	Letter from counsel for Orca Security Ltd. to counsel for Wiz, Inc. (May 20, 2024), filed in *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Sept. 10, 2024), ECF No. 140-2
2069	Letter to the Honorable Sherry R. Fallon from Rodger D. Smith Regarding Discovery Disputes, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Oct. 9, 2024), ECF No. 165
2070	Francis & James Berthoty, *Redefining CNAPP: A Complete Guide to the Future of Cloud Security,* Software Analyst Cyber Research, (Sept. 12, 2024), https://softwareanalyst.substack.com/p/redefining-cnapp-a-complete-guide
2071	Memorandum Order, *Orca Sec. Ltd. v. Wiz, Inc.*, No. 1:23-cv-00758 (D. Del. Oct. 22, 2024), ECF No. 182
2072	Declaration of Blake R. Davis Pursuant to 37 C.F.R. § 42.10(c)(2)

Respectfully submitted,

Dated: March 11, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 11th day of March, 2025, a true and correct copy of the foregoing **Patent Owner's Updated Exhibit List and Exhibit 2072** were served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

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