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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.

Case IPR2024-01190
Patent No. 11,740,926

PETITIONER'S OPPOSITION TO MOTION FOR ADDITIONAL DISCOVERY

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I. INTRODUCTION

Petitioner Wiz, Inc. ("Wiz") respectfully requests the Board deny Patent Owner Orca Security Ltd.'s ("Orca" or "PO") motion for additional discovery ("Mot.") requesting Wiz produce certain materials from a parallel district court litigation (*Orca Security Ltd. V. Wiz, Inc.*, No. 1-23-cv-00758 (D. Del.)) (the "Delaware Litigation") where Orca alleges that Wiz infringes the same patent that Wiz challenges here. The Board should deny PO's motion because of at least *Garmin* Factors 1, 3, and 5. *Garmin Int'l, Inc. v. Cuozzo Speed Techs. LLC*, IPR2012-00001, Paper 26 ("*Garmin*") (precedential). As described in detail below, PO's motion fails to even attempt the threshold showing of nexus required by *Garmin* Factor 1. Moreover, PO provides only vague, overbroad allegations and mischaracterizations to support its contention that the Requested Documents are "useful." Regarding *Garmin* Factor 3, PO fails to inform the Board that it has an alternative means to obtain the discovery—seeking relief in district court—despite expressly preserving that option when negotiating the litigation stay. Finally, as to *Garmin* Factor 5, Wiz is and will be prejudiced by the burden of both responding to PO's overbroad request and preserving the confidentiality of the non-public information in future filings in this IPR. Accordingly, PO's motion should be denied.

II. THE *GARMIN* ANALYSIS WEIGHS IN FAVOR OF DENYING DISCOVERY

a. *Garmin* Factor 1 – PO Provides Only Speculation Regarding The Usefulness The Requested Documents

Garmin Factor 1 weighs heavily against granting discovery. PO has failed to show the "usefulness" of the Request Documents for at least two reasons. First, PO—by its own admission—neglects to provide even a nominal showing of nexus between PO's technology and the claims-at-issue. Second, PO supports its contentions of usefulness with nothing more than "mere allegation[s]" based on mischaracterizations and misapprehensions. *Id*., 8.

Under *Garmin* Factor 1, PO must show "beyond speculation that something useful will be uncovered" with its discovery requests. *Id.*, 7. "Useful" "does not mean merely 'relevant' and/or 'admissible,'" but "favorable in substantive value to a contention of the party moving for discovery." *Id*. Where, as here, a party seeks alleged secondary considerations evidence, it "must provide a threshold showing of nexus between the claimed invention and the evidence sought." *Ashworth Bros., Inc. v. Laitram, L.L.C.*, IPR2020-00593, Paper 15, 7 (citing *Garmin*, 8); *Microsoft Corp. v. Proxyconn, Inc.*, IPR2012-00026, Paper 32, 5 (interest of justice standard requires some showing of nexus). For example, in *Palo Alto Networks v. Juniper Networks*, the Board held that "[a]lthough a conclusive showing of nexus is not required at this juncture, at least some showing of relevance is necessary to

ascertain what constitutes the [allegedly patented] feature, and how the claims for which trial was instituted embody the [allegedly patented] feature." IPR2013-00369, Paper 36, 4 (denying discovery motion); *Ashworth Bros.*, Paper 15, 7 ("Patent Owner has not provided even a threshold showing that its [allegedly patented] system includes the features recited in the claims.").

PO's motion fails to even mention nexus, let alone make the requisite showing. PO alleges that Wiz copied its "SideScanning" technology but fails to explain—even at a high level—what constitutes SideScanning technology. Moreover, PO concedes it does not explain how SideScanning technology embodies the challenged claims as required, opting to wait and do so until a later filing. Mot., 6 (discussing "Orca's SideScanning™ technology, ***which Orca will show in its Patent Owner Response … embodies the challenged claims***.") (emphasis added). Thus, to the extent PO touches on the issue at all, it serves as an admission that its motion is deficient. Accordingly, in line with previous decisions, the Board should deny the discovery request. *Palo Alto Networks*, Paper 36, 4; *Ashworth Bros.*, Paper 15, 7.

Additionally, PO's failure to establish a threshold showing of nexus is in direct contrast to the facts of *MOM Enters., LLC v. Veith*, relied on heavily throughout the motion. *E.g.*, Mot., 5, 8, 9 (citing IPR2023-00726, Paper 45). In *MOM Enters.*, the Board predicated its analysis on the patent owner's prior

showing of nexus between the claims and the allegedly copied product. *MOM Enters*., Paper 45, 1 n.2 (preliminary record, including evidence demonstrating product's "composition, dose, and instructions for use," established that product "embodies the claimed invention"). PO effectively admits it did not make the requisite showing, as explained above, so *MOM Enters*. only serves to reinforce the motion's deficiencies.

Second, beyond the motion's silence regarding nexus, PO fails to establish that its request is reasonably tailored to obtain useful information. A "mere allegation" of usefulness is insufficient. *Garmin*, 8; *see also*, *Polygroup Ltd. v. Willis Electric Co., Ltd.*, IPR2016-00800, Paper 28 ("*Polygroup I"*), 13 (*Garmin* Factor 1 dispositive where movant only "alleg[ed] that certain documents are 'highly probative'"). This remains the case even when a protective order prevents a moving party from discussing documents it seeks. *Duncan Parking Techns., Inc. v. IPS Group Inc.*, IPR2016-00067, Paper 18, 3 (holding "circumstance does not weigh in [Patent Owner's] favor" when protective order prevents "substantive discussion of the content").

Here, PO admits it does not explain the usefulness of the Requested Documents by reference to their contents and instead asks "the Board to rely on Orca's representations from the Wiz Litigation"—self-serving characterizations of ***other***, publicly available documents and PO's own heavily redacted Interrogatory

No. 11 ("Rog 11") response. Mot., 5-6, 8; EX2056. Such characterizations do not establish usefulness of the documents at issue in PO's motion and should be given no weight. *See Duncan Parking*, Paper 18, 3.

Regardless, PO's characterization of its Rog 11 response, and thus the Requested Documents, is facially inaccurate. For example, Rog 11 is not directed to the more limited contention that Wiz copied Orca's SideScanning technology, but rather that Wiz "copied ***anything from, or related to, Orca,*** including ***but not limited to*** the Asserted Patents." EX2056, 2. Moreover, Rog 11 is completely untethered from PO's further, unsubstantiated contentions regarding skepticism, industry praise, and commercial success. Mot., 1.

Moreover, while PO contends it explained the relevance of the Requested Documents "in its detailed narrative response" to Rog 11 (Mot., 5), the Requested Documents include additional documents not cited in PO's Rog 11 response. EX2059, 6. PO's blanket reliance on a redacted interrogatory response, which fails to support even its request for the documents cited in that response, cannot justify discovery of additional documents unmentioned in the response. PO's motion does not even address those documents.

Lastly, PO's usefulness allegations improperly equate district court and PTAB discovery standards. Mot., 7-8. PO alleges that the Requested Documents are a subset of documents that were deemed "facially relevant" by the district court

and thus, should be deemed "facially useful" by the Board. *Id*. Orca fundamentally misapprehends the PTAB's discovery standard. Discovery in *inter partes review* proceedings is by design more limited than the district court and utilizes an "interest of justice standard" that is more "conservative in its grants of discovery." *Intex Recreation Corp. v. Team Worldwide Corp.*, IPR2018-00859, Paper 41, 4. Thus, what is "facially relevant" in district court does not define what is "useful" in an IPR. *Garmin*, 7 ("'Useful' in that context does not mean merely 'relevant' and/or 'admissible.'").

b. *Garmin* Factor 2 – Lack Of Litigation Positions Is Not Dispositive

Even if the Board finds that PO is not seeking litigation positions, such a finding is not dispositive. *See., e.g.*, *Polygroup I*, 10-11 (not seeking litigation positions), 13 (discovery denied due to *Garmin* Factor 1); *Intex*, Paper 41, 6-7, 17 (similar).

c. *Garmin* Factor 3 – PO Has Other Means of Generating Equivalent Information

Garmin Factor 3 weighs heavily against granting discovery. As explained below, PO has the ability to generate equivalent information by approaching the district court for permission to use the Requested Documents in the IPRs. Indeed, PO itself ensured the ongoing availability of those means during the litigation stay and expressly identified the district court's process as the appropriate mechanism for seeking submission of protected documents in the IPRs.

PO's refusal to pursue available means in district court is dispositive. Under *Garmin* Factor 3, PO must show that it lacks the ability to obtain equivalent information by other means. *Garmin*, 6, 13-14. When, as here, the party seeking protected documents can seek relief from the district court that issued the protective order, "approaching the district court for permission to use the documents was, and is, 'other means.'" *L'Oreal USA, Inc. v. Liqwd, Inc.*, PGR2017-00012, EX2019 (redacted version of order on discovery motion), 9-10; *Polygroup Ltd. v. Willis Electric Co., Ltd.*, IPR2016-01610, Paper 54, 6 ("*Polygroup II*") (same); *Duncan Parking*, Paper 18, 3-4 (same). The Federal Circuit has confirmed that denial is appropriate in such circumstances. *Wildcat Licensing WI LLC v. Atlas Copco Tools & Assembly Sys. LLC*, No. 2022-1304, 2024 WL 89395, at *4-5 (Fed. Cir. Jan. 9, 2024) (no abuse of discretion); *Atlas Copco Tools & Assembly Sys. LLC v. Wildcat Licensing WI LLC*, IPR2020-00891, Paper 37, 15 (denying request where party could have sought relief in district court). As in those cases, PO was and is able to ask the district court for permission to use the Requested Documents. This stands in stark contrast to *MOM Enters.*, cited by PO (Mot., 9), where it was undisputed that "no other means" were available. *MOM Enters.*, Paper 45, 8. PO's refusal to pursue other means—despite having known for months that it would be seeking these documents (*e.g.*, EX2059, 11-12)—does not make those means any less available. *E.g.*, *Duncan*

Parking, Paper 18, 3 (noting that requesting party was aware that it could approach the district court before filing motion).

Indeed, PO expressly identified the district court's processes as the means for seeking submission of protected documents in the IPR. In negotiating the stay order in district court, PO proposed language explicitly preserving its ability to approach the district court to "facilitate the disclosure" of protected documents in the IPRs without violating the stay. EX1112, ¶4. When asked to explain the purpose of this language, PO clarified that it ensures that "there is a mechanism in place for the district court to evaluate" disputes over submitting protected documents in IPRs. EX2058, 1-3 (discussing language originally presented in ¶3). Thus, other means not only exist, ***PO itself*** successfully negotiated their ongoing availability.

The restrictions of the protective order further demonstrate that the other means available to PO in district court are the appropriate means for resolving this dispute. Though ignoring that its actions in pursuing this motion are themselves violations of the protected order (EX1113), PO blames the protective order for PO's inability to articulate the purported usefulness of the Requested Documents. Mot., 5. But these restrictions show why the other means available to PO in district court—where PO has no such restrictions—are better suited for resolving this dispute.

d. *Garmin* Factor 4 – Easily Understandable Instructions Are Not Dispositive

The Board has routinely denied discovery requests that include a list of Bates numbered documents. *See., e.g.*, *Polygroup I*, 3, 13 (denying discovery of ten Bates numbered documents); *Intex*, Paper 41, 7, 15, 17 (similar).

e. *Garmin* Factor 5 – PO's Request is Overly Burdensome

Garmin Factor 5 also weighs against discovery. Relevant burdens include financial burden and burden on human resources. *Garmin*, 14. PO's vague, overbroad request has required Wiz to spend, and continue to spend, substantial financial and human resources responding to PO's request. If discovery is granted, Wiz will then be forced to spend additional substantial efforts redacting the Requested Documents to protect its confidential information.

PO's overbroad and vague explanation as to usefulness is unduly burdensome. "Requests should be sensible and reasonably tailored." *Id*. As explained above, PO relies on an unredacted portion of its Rog 11 response which facially describes the inclusion of alleged copying evidence beyond the scope of what reasonably could be construed as relating to secondary considerations, while at the same time lacks any discussion of other aspects of the discovery sought (e.g., industry skepticism and praise). *See supra* §II.a. PO effectively shifts the burden to Wiz to rebut PO's vague allegations of usefulness. This is no small task considering the Requested Documents total over 6,500 pages. Furthermore, Wiz

has incurred financial cost to regain and maintain access to the Requested Documents after the production database was archived following the litigation stay. Nor is the fact that PO identifies the documents it seeks by specific Bates number sufficient to remove burden concerns. *Polygroup II*, 7 (denying request for Bates numbered documents where, *inter alia*, "Patent Owner does not take into account costs in the present proceedings").

Additionally, should PO's request be granted, Wiz will be required to spend considerable resources to preserve the confidentiality of those documents, including by identifying appropriate redactions when they are filed as exhibits. "Although the status of information as confidential does not prohibit its discovery, the efforts undertaken to maintain that information as confidential, nevertheless, must be considered." *Duncan*, Paper 18, 4 (denying discovery motion and noting "cost and effort" in respect to redaction efforts); *see also Polygroup I*, 7 (denying discovery motion in view of "the burden of redacting information" sought by request); *Apple, Inc. v. SightSound Techs., LLC*, CBM2013-00020, Paper 40, 6 (denying discovery request that would require "implementing complex confidentiality protections … and would be unduly burdensome").

III. CONCLUSION

Wiz respectfully requests that PO's motion for additional discovery be denied.

Dated: March 12, 2025

Respectfully submitted,

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

Exhibit List

Exhibit No.	Description
1001	U.S. Patent No. 11,740,926 to Shua
1002	Declaration of Dr. Angelos Stavrou
1003	*Curriculum Vitae* of Dr. Angelos Stavrou
1004	File History of U.S. Patent Application No. 18/055,220 ('926 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
1014	Klemperer, "Efficient Hypervisor Based Malware Detection," Carnegie Mellon University (May 2015)

Exhibit No.	Description
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)

Exhibit No.	Description
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)
1038	Suneja, "Exploring VM Introspection: Techniques and Trade-offs," ACM, VEE'15 (Mar. 2015) http://dx.doi.org/10.1145/2731186.2731196

Exhibit No.	Description
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)
1053	U.S. Publication No.2010/0070725 A1 to Prahlad
1054	U.S. Patent No. 9,830,182 B2 to Ackley

Exhibit No.	Description
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
1061	Intentionally Left Blank
1062	Intentionally Left Blank
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)

Exhibit No.	Description
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
1081	U.S. Publication No. 2010/0169948 A1 to Budko
1082	United States District Courts—National Judicial Caseload Profile (December 31, 2023)

Exhibit No.	Description
	https://www.uscourts.gov/sites/default/files/fcms_na_distprofile1231.2023_0.pdf
1083	Amended Scheduling Order (Dkt. No. 90), *Orca security ltd. v. Wiz, Inc., No. 1:23cv-00758-GBW (DDE)*
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	Intentionally Left Blank
1089	Intentionally Left Blank
1090	Archived copy of "Vulnerability Details : CVE-2006-2923," published by CVE Details and archived on July 29, 2014, by the Internet Archive's "Wayback Machine" https://web.archive.org/web/20140729171850/https://www.cvedetails.com/cve/CVE-2006-2923/
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/

Exhibit No.	Description
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	U.S. Patent No. 9,088,606 B2 to Ranum
1094	U.S. Publication No. 2019/0180028 A1 to SEO
1095	U.S. Publication No. 2017 / 0372070 A1 to Burdett
1096	U.S. Publication No. 2017 / 0251013 A1 to Kirti
1097	U.S. Publication No. 2017/0111384 A1 to Loureiro
1098	U.S. Patent No. 8,732,834 B2 to Mao
1099	U.S. Publication No. 2020/0167463 A1 to Adams
1100	Archived copy of "Vulnerability Details : CVE-2018-6954," published by CVE Details and archived on December 11, 2018, by the Internet Archive's "Wayback Machine" https://web.archive.org/web/20181211090742/http://www.cvedetails.com/cve/CVE-2018-6954
1101	Archived copy of "CVE-ID: CVE-2018-15687," published by MITRE Corp. and archived on December 11, 2018, by the Internet Archive's "Wayback Machine" https://web.archive.org/web/20181211082546/https://cve.mitre.org/cgi-bin/cvename.cgi?name=CVE-2018-15687
1102	Archived copy of "CVE-ID: CVE-2018-1312," published by MITRE Corp. and archived on January 5, 2019, by the Internet Archive's "Wayback Machine" https://web.archive.org/web/20190105194958/https://cve.mitre.org/cgi-bin/cvename.cgi?name=CVE-2018-1312
1103	Archived copy of "Vulnerability Details : CVE-2013-2765," published by CVE Details and archived on July 20, 2014, by the Internet Archive's "Wayback Machine"

Exhibit No.	Description
	https://web.archive.org/web/20140720123338/https://www.cvedetails.com/cve/CVE-2013-2765
1104	Archived copy of "Vulnerability Details : CVE-2017-12172," published by CVE Details and archived on January 3, 2019, by the Internet Archive's "Wayback Machine" https://web.archive.org/web/20190103092517/https://cvedetails.com/cve/CVE-2017-12172
1105	Archived copy of "Defense Privacy, Civil Liberties, and Transparency Division, U.S. Department of Defense, FAQs," archived on May 17, 2018, by the Internet Archive's "Wayback Machine" at https://web.archive.org/web/20180517201830/http:/dpcld.defense.gov/Privacy/About-the-Office/FAQs
1106	Wiz, Inc.'s Stipulation Concerning Invalidity Grounds (Dkt. No. 213), *Orca Security Ltd., v. Wiz, Inc.*, 1:23-cv-00758-JLH (D. Del. December 10, 2024)
1107	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*]
1108	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*]
1109	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"

Exhibit No.	Description
	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*]
1110	Supplemental Declaration of Dr. Angelos Stavrou [served, not filed]
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)

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6, the undersigned certifies that on March 12, 2025, a copy of the foregoing document was served by electronic mail, as agreed to by the parties, to the following individuals:

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