Bajaj, Raghav (ATX)

From: Argenti, Matthew <margenti@wsgr.com>
Sent: Friday, March 28, 2025 6:44 PM
To: Bajaj, Raghav (ATX); Bruner, Nicole (DC)
Cc: Davis, Blake (Bay Area); Henry, Christopher (BN); Lonergan, Lucas (Bay Area); Peters, Steven (DC); Lumish, Douglas (Bay Area); McKenna, Krissy (BN); Derryberry, Wes; Rosato, Michael; Baillargeon, Joe
Subject: RE: IPR2024-00863, IPR2024-00864, IPR2024-00865 - Dr. Stavrou Deposition Availability

Raghav,

Without waiving any evidentiary objections or rights under the district court protective order, we confirm production of the requested documents in the IPRs pursuant to the Board's order. The documents should be treated with the same level of confidentiality designation as in the district court case.

We also agree to your requested additional extension provided it will not preclude a further extension for our petitioner replies should one become necessary.

Regards,
Matt

Matthew A. Argenti
Wilson Sonsini Goodrich & Rosati
650 Page Mill Rd., Palo Alto, CA 94304
Direct: (650) 354-4154
Fax: (650) 493-6811

From: Raghav.Bajaj@lw.com <Raghav.Bajaj@lw.com>
Sent: Friday, March 28, 2025 2:06 PM
To: Argenti, Matthew <margenti@wsgr.com>; Nicole.Bruner@lw.com
Cc: Blake.Davis@lw.com; Christopher.Henry@lw.com; Lucas.Lonergan@lw.com; Steven.Peters@lw.com; Doug.Lumish@lw.com; Krissy.McKenna@lw.com; Derryberry, Wes <wderryberry@wsgr.com>; Rosato, Michael <mrosato@wsgr.com>; Baillargeon, Joe <jbaillargeon@wsgr.com>
Subject: RE: IPR2024-00863, IPR2024-00864, IPR2024-00865 - Dr. Stavrou Deposition Availability

EXT - raghav.bajaj@lw.com

Matt,

Thank you for the email.

In view of the Board's order, please confirm production in all six IPRs of the Wiz documents listed in Ex.2053 that Orca specified in its request for additional discovery. *See* Order at 6.

Relatedly, on the extension, assuming that the documents will be produced today, please let us know if Wiz would agree to the following minor modified extension to the due dates in the -00863, -00864, and -00865 proceedings, to accommodate Dr. Kaeli's review of the additional discovery:

Orca Security Ltd.
Exhibit 2171
Wiz v. Orca
IPR2024-01190
Ex. 2171-001

Due Dates	Original Date	Currently-Agreed Date	Patent Owner's Requested Date
Due Date 1	March 6, 2025	April 3, 2025	April 7, 2025
Due Date 2	May 29, 2025	June 27, 2025	July 1, 2025
Due Date 3	July 10, 2025	August 7, 2025	August 11, 2025

Best regards,

Raghav

Raghav Bajaj

LATHAM & WATKINS LLP
300 Colorado St. | Suite 2400 | Austin, TX 78701
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From: Argenti, Matthew <margenti@wsgr.com>
Sent: Friday, March 28, 2025 1:29 PM
To: Bajaj, Raghav (ATX) <Raghav.Bajaj@lw.com>; Bruner, Nicole (DC) <Nicole.Bruner@lw.com>
Cc: Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Henry, Christopher (BN) <Christopher.Henry@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Peters, Steven (DC) <Steven.Peters@lw.com>; Lumish, Douglas (Bay Area) <Doug.Lumish@lw.com>; McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Derryberry, Wes <wderryberry@wsgr.com>; Rosato, Michael <mrosato@wsgr.com>; Baillargeon, Joe <jbaillargeon@wsgr.com>
Subject: RE: IPR2024-00863, IPR2024-00864, IPR2024-00865 - Dr. Stavrou Deposition Availability

Raghav,

I presume the Board's order today obviates the need for an additional extension, but let me know if you would like to discuss further.

Regards,
Matt

Matthew A. Argenti
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From: Raghav.Bajaj@lw.com <Raghav.Bajaj@lw.com>
Sent: Friday, March 28, 2025 10:12 AM
To: Argenti, Matthew <margenti@wsgr.com>; Nicole.Bruner@lw.com
Cc: Blake.Davis@lw.com; Christopher.Henry@lw.com; Lucas.Lonergan@lw.com; Steven.Peters@lw.com; Doug.Lumish@lw.com; Krissy.McKenna@lw.com; Derryberry, Wes <wderryberry@wsgr.com>; Rosato, Michael <mrosato@wsgr.com>; Baillargeon, Joe <jbaillargeon@wsgr.com>
Subject: RE: IPR2024-00863, IPR2024-00864, IPR2024-00865 - Dr. Stavrou Deposition Availability

EXT - raghav.bajaj@lw.com