

PROTECTIVE ORDER MATERIAL
REDACTED

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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.

IPR2024-01190
Patent No. 11,740,926

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 that withstands no scrutiny. PO’s other secondary-considerations arguments similarly fail.

II. CLAIM CONSTRUCTION

A. “location”

PO does not dispute Wiz’s construction. Paper 28 (“POR”), 6-7. Moreover, PO’s expansive view of “location” reinforces Wiz’s obviousness arguments. *Id.*, 36, 55-56; [REDACTED] EX1400, ¶9.

B. “analyzing the snapshot”

PO’s argument that the claims exclude Veselov’s instantiated assessment-VM approach is contradictory. POR, 5-7. 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)); EX1401, 33:12-36:11; EX1402, 215:5-222:7. PO argues that a document describing “examin[ing] the VMs spun up from the snapshot” shows Wiz practicing this limitation. POR, 55 (citing Kaeli-Dec, ¶263); Kaeli-Dec, ¶263

(citing EX2026, 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., 34-40; 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

As explained below, PO mischaracterizes the record and misapplies the law of obviousness.

PO fails to refute the references’ consideration of the same types of data. Relying on 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, 9-12 (arguing 5A/B snapshot lacks dynamic data and network properties). But Veselov says the 3A/B and 5A/B snapshots are the “same.” EX1007, 16:56-67. Previous descriptions similarly describe the same snapshot content in both approaches. EX1007, 3:20-4:4, 9:14-10:16; EX1400, ¶¶16, 22. The 3A/B approach offers an additional way to use stored activity/connection data, but that stored data is in the snapshot. EX1007, 15:50-59 (snapshot 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 subsequent assessment tasks or snapshot contents. EX1007, 18:34-44; EX1400, ¶23. PO's claim that snapshot assessments were "rudimentary" relies on a competitor's marketing. POR, 10; EX2106; EX1400, ¶21. Regardless, Veselov contradicts PO's characterization. EX1007, 3:20-4:4, 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. Kaeli-Transcript, 15:16-24:10.

PO's teach-away argument fails. PO claims Mohanty's background discussion of continuous assessments disparages Veselov's snapshot-based assessments. POR, 12-13.¹ But Mohanty refers to a "snapshot **of a vulnerability assessment report**," not VM/disk snapshots. EX1075, 1:7-22 (emphasis added);

¹ To the extent PO is implying Veselov does not address virtual "cloud" assets (POR, 12), the evidence shows otherwise. EX1007, 2:22-3:19 (cloud applicability); EX1400, ¶¶14, 52-53 (citing EX1118-1120); EX1401, 38:17-50:12 (discussing EX1118-1120 and admitting Veselov's "service provider" refers to cloud provider).

EX1400, ¶17. Regardless, Veselov's approach is reasonably current and continuous. EX1007, 4:1-18 (periodic assessments), 6:25-49 (on-demand assessments), 8:62-9:25 (fresh snapshots); EX1400, ¶¶17, 28-29. Additionally, the combination provides a net benefit to Veselov by applying threat-detection, risk-level-evaluation, and prioritized-alert teachings. Pet., 21-26; EX1007, 2:42-4:4 (benefits of snapshot-based assessments); EX1400, ¶17; *Medichem, S.A. v. Rolabo, S.L.*, 437 F.3d 1157, 1165-67 (Fed. Cir. 2006) (consider benefits gained/lost); *In re Urbanski*, 809 F.3d 1237, 1243-44 (Fed. Cir. 2016). PO claims Veselov cautions against complexity (POR, 12-13), but it is addressing installation/monitoring of agents on the target, which the combination does not involve. EX1007, 2:42-3:19; EX1400, ¶27. The applied teachings are not overly complex, and Veselov encourages multiple assessment tasks. EX1007, 2:35-41; EX1400, ¶27.

PO's complaint of insufficient implementation details lacks merit. Wiz explained the references' consideration of comparable data, Veselov's straightforward processes for collecting the data, and the combination's predictable application of Mohanty's assessment techniques. Pet., 15-17, 22-25, 34-40; EX1007, 3:61-4:4, 8:30-45, 9:55-67, 17:9-29 (analyze mounted volume image like disk drive), 18:32-53 (identify files, software, etc. via string/pattern comparison); EX1400, ¶20; *see also* Kaeli-Transcript, 21:11-19 (familiar with string comparison). PO claims Wiz did not explain how to use agent-based techniques

with snapshots. POR, 13-14. But this improperly assumes bodily incorporation of agents. *In re Mouttet*, 686 F.3d 1322, 1332 (Fed. Cir. 2012); Pet., 21-25; EX1400, ¶¶18-19, 30. Regardless, Mohanty is not limited to agents. EX1400, ¶18 (citing EX1400; EX1039; EX1040); EX1415 (“Kaeli-Transcript”), 8:14-22 (Qualys and Rapid7 are “examples”), 10:3-11:11 (POSA familiar with non-agent-based scanners).

PO’s additional arguments fail. PO treats evidence of the POSA’s knowledge as indicative of hindsight (POR, 14), which is contrary to *KSR*. Pet., 22-25 (citing *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 416-17 (2007)). PO claims Wiz only showed what was possible (POR, 14), but Wiz discussed multiple motivating factors including enhanced assessment accuracy and useful prioritization. Pet., 23-25; EX1400, ¶¶24-26, 31.

B. The Combination Satisfies the Claims

1. Elements 1.4/14.4/15.4

Wiz showed that the combination teaches snapshot analysis to determine potential cyber threats and that these threats are based on stored data that includes the recited data types. Pet., 34-40. PO’s response fails.

First, PO fails to address the combination. PO’s argues that Mohanty does not analyze snapshots, but attacking the references individually lack merit. POR, 22; *Palo Alto Networks, Inc. v. Centripetal Networks, LLC*, 122 F.4th 1378, 1386

(Fed. Cir. 2024). PO claims Wiz discussed the references separately and merely showed that the combination was possible. POR, 16, 22, 25-26. But Wiz explained the application of Mohanty’s threat-detection teachings to snapshot analysis (*supra*, §III.A; Pet. 22-26) then addressed element 1.4 based on the combined teachings. Pet., 34-40. EX1400, ¶¶32-34.

Second, PO’s “cyber threats” arguments fail. PO claims CVEs are not cyber threats. POR, 17-18, 23. But the specification says threats include vulnerabilities in applications. EX1001, 1:56-60, 4:45-47, 6:40-43. The specification states that *some* threats are not vulnerabilities but gives no indication that CVEs are excluded. EX1001, 6:20-32; EX1400, ¶¶35-36. Indeed, Mr. Shua relies on CVE detection when arguing that PO practices the claims. Shua-Dec, ¶¶47, 52, 59. PO argues that non-secure configurations are not recited (POR, 19-20), but Wiz showed that configuration assessments were known to identify weak passwords and weak encryption schemes. Pet., 37-40; EX1400, ¶¶37, 40. PO claims Mohanty is limited to “external” threats and “never analyzes the virtual cloud asset” to determine threats that are based on stored data. POR, 23. But Mohanty correlates threat information with the asset’s data. Pet., 38-39; EX1075, 5:16-58, 7:33-8:18; EX1400, ¶39.

Third, PO’s argument addressing the recited data types fail. Wiz addressed unencrypted sensitive data, weak encryption schemes, personally identifiable

information (“PII”), weak passwords, and startup services. Pet., 38-40. As to “unencrypted sensitive data,” PO claims Wiz “contends it has carte blanche to combine Veselov with *any* security assessment.”² POR, 21; EX1007, 2:35-41. But the petition explains why the applied teachings of Mohanty are consistent with and beneficial to Veselov. Pet., 22-25, 36-37; EX1400, ¶38. PO claims Veselov “only teaches detecting ‘vulnerabilities’ and ‘host configuration assessments,’” which are not listed data types. POR, 21. But Veselov is not limited to vulnerability and configuration assessments. EX1007, 2:35-41, 3:20-4:4; EX1400, ¶35. Regardless, Wiz explained why Veselov’s discussion of assessment tasks is consistent with Mohanty’s more specific teachings of determining threats based on unencrypted sensitive data. Pet., 36-40. PO argues that the “DSPM” category gained prominence later (POR, 22), but such sensitive-data protection did not originate with the DSPM label. EX1400, ¶¶45, 92-94.

PO’s isolated attack on Mohanty fails. PO claims sensitive data is detected before deployment, not using dynamic tags or by analyzing a snapshot. POR, 24-25. But this is a red herring since the *combination* detects sensitive data in snapshot-based assessments. Pet., 38-40. Regardless, Mohanty states that tags

² PO does not address PII beyond its general sensitive-data argument.

(not just dynamic tags) can be added later. EX1075, 5:16-58, 7:49-56; EX2172, 209:12-19; EX1400, ¶¶41-42.

PO also fails to read Mohanty from the POSA's perspective. *Janssen Pharms., Inc. v. Teva Pharms. USA, Inc.*, 97 F.4th 915, 928 (Fed. Cir. 2024) (references read for all they fairly suggest). PO argues that Mohanty does not expressly discuss dynamic detection of "sensitive data." POR, 24-25. But this ignores the POSA's familiarity with routine sensitive-data detection in system files, Mohanty's general description of adding tags, and Mohanty's encryption recommendations for some sensitive data, which suggests particularized detection/evaluation. Pet., 39; EX1002, ¶163; EX1075, 10:27-34; EX1400, ¶¶42-43, 92-94; EX2172, 194:9-199:2 (Mohanty teachings detecting underlying sensitive data), 199:3-204:9 (dynamic detection encompasses sensitive-data detection). PO claims Dr. Stavrou was unable to explain how to combine Mohanty's tags with Veselov. POR, 26 (citing EX2172, 206:4-16). But Dr. Stavrou appropriately rejected PO's bodily-incorporation framing³ and explained

³ Even if bodily incorporation were required—and it is not—Veselov explains that the snapshot can include metadata tags. EX1007, 9:32-37, 10:24-36.

the routine nature of applying Mohanty's teachings to snapshot analysis. EX2172, 205:10-207:2; EX1002, ¶¶109-11, 162-65; EX1400, ¶42.

PO's "weak password" and "weak encryption scheme" arguments also fail. PO argues lack of express or inherent disclosure (POR, 19-21) but ignores Mohanty's teachings and Wiz's obviousness reasoning. Pet., 39-40; EX1400, ¶¶37, 43. PO sidesteps corroborating evidence by claiming background-section citations are too general (POR, 22) but ignores targeted citations to Dr. Stavrou's discussion of the relevant evidence. Pet., 39 (citing EX1002, ¶¶51, 55, 162).

PO's startup-services arguments fail. PO argues that risky application features are not recited (POR, 18), but Wiz discussed risky application features to show that "cyber threats" encompass CVEs before turning to typical startup-service CVEs. Pet., 36-37, 40; EX1400, ¶44. PO claims Wiz did not explain the startup-services examples. POR, 18. But Wiz demonstrated the POSA's understanding that typical CVE assessments covered numerous startup services on VMs like those in Veselov. Pet., 40; EX1002, ¶166; EX1400, ¶44. PO's inherency strawman sidesteps Wiz's explanation of the POSA's understanding of what the references suggest. POR, 18-19; Pet., 40; EX1002, ¶¶166-67; EX1400, ¶44.

PO invokes secondary considerations (POR, 26), but PO's evidence indicates nothing special about using commonplace threat-determination techniques with snapshots. *Infra*, §VII; EX1400, ¶¶92-94.

2. Elements 1.5-1.6/14.5-14.6/15.5-15.6

PO's arguments for elements 1.5-1.6 fail. PO repeats flawed arguments for element 1.4. POR, 26-27; *supra*, §III.B.1; EX1400, ¶46. PO claims Wiz improperly shifted its "cyber threats" mapping to the "threat score." POR, 26-27. But Wiz identified threat scores as the "risk associated with each threat," not the threats themselves. Pet., 41-42.

3. Elements 1.7/14.7/15.7

PO's "alert" arguments fail. PO claims Veselov reports vulnerabilities, not threats. POR, 27-28. But this is wrong (*supra*, §III.B.1) and attacks the references individually. EX1400, ¶¶47-48. PO claims Veselov does not report identified issues as "alerts." POR, 28-29. But Veselov brings specific problems/remediations to the user's attention, which is what PO says alerts do. Pet., 42; 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, ¶48; Kaeli-Dec, ¶151 (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 prioritization arguments fail. PO repeats its flawed "external" threat argument. POR, 29; *supra*, §III.B.1. PO claims Mohanty's prioritization score is associated with vulnerabilities, not "cyber threats." POR, 29. False dichotomy aside, Mohanty teaches prioritized alerts for the previously discussed threats. Pet., 43-44; EX1075, 9:16-26; *supra*, §III.B.1; EX1400, ¶49. PO claims the alerts do not relate to the recited data types. POR, 29-30. But Mohanty teaches reporting prioritized alerts for each detected threat, and Wiz addressed the recited types for element 1.4. Pet., 43-44; *supra*, §III.B.1. PO claims secondary-considerations evidence shows that communicating scores/rankings was uncommon (POR, 30), but the record shows otherwise. *Infra*, §VII.B; EX1400, ¶¶50, 90-91.

4. Claim 13

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., 53-57. In response, PO deflects.

PO's arguments addressing "virtual disk" location fail. PO claims Wiz conceded that Veselov lacks virtual-disk-location queries (POR, 30), but Wiz showed the opposite. Pet., 55-57. PO claims Wiz argued that such querying was obvious simply because the user's initial request can identify a target VM (POR, 30-31), but the scan request was just the starting point of Wiz's analysis. Pet., 53-57. PO claims the user already knows the location of the VM and its components

because the request can identify the VM. POR, 31. 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, ¶¶51, 58.

PO attacks strawmen. PO claims Wiz's first point (involving the snapshot's/disk's general location) is inherency because it supposedly relies "exclusively" on figures. POR, 32. But Wiz cited other evidence and explained what Veselov suggests to a POSA. Pet., 56-57 (citing EX1002, ¶231); EX1400, ¶¶59-61. PO argues that snapshots in Figure 1 are located in a separate storage service and that the snapshots in other figures are read by a hypervisor. POR, 32. But the storage service is optional (EX1007, 5:1-22), and hypervisors and cloud APIs are not mutually exclusive. EX1400, ¶¶54, 57. PO argues that locating a VM does not necessarily locate its disks. POR, 31. But Wiz did not rely on inherency (Pet., 55-57) and the record does not indicate that the general storage locations of VMs and their disks are typically different. EX1400, ¶¶56-57 (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, 31, 32-33; Pet., 56-57; *Janssen*, 97 F.4th at 928; EX1400, ¶55.

PO's secondary-consideration arguments fail. PO says disk-locating was commercially important (POR, 32-33) but does not prove commercial success or nexus. *Infra*, §§VII.A, VII.B.5; EX1400, ¶¶78-83, 131-34. Moreover, the

supposedly important location is not what PO later identifies as the location. Compare POR, 32-33 (emphasizing physical storage location) with *id.*, 36 (snapshotId). PO also fails to prove copying. EX1400, ¶¶62, 114-30; *infra*, §§VII.A, VII.B.4.

IV. GROUND 2

PO relies on mischaracterization and legal error. PO claims Wiz merely argued that the claims use known elements for known functions. POR, 62. But Wiz explained the straightforward application of Ranum's well-known hash-comparison and risk-reporting techniques to snapshot-based assessments and discussed multiple motivating factors. Pet., 58-60. PO argues that Ranum's interaction with running assets is impossible for snapshots. POR, 63-66. However, this improperly assumes bodily incorporation of Ranum's data-collection process. Pet., 58-60; EX1002, ¶¶240-41; EX1400, ¶¶63-64. PO claims the references analyze different types of data, but PO focuses on *how* Ranum collects data, not what the data is. POR, 65. PO argues that some data available to Ranum's network scanner is different from snapshot data (POR, 65), but PO does not dispute that the *relevant* data ("e.g., files") is equivalent. Pet., 58; EX1400, ¶65.

PO's claim-2 arguments fail. PO argues that Ranum detects malware signatures, which are not recited. POR, 66. But PO does not dispute Wiz's

showing that the combination teaches determining threats based on “at least one change in at least one area of the virtual disk, as compared to an earlier point in time.” Pet., 62. Wiz then explained how this data is detected by “determining an unexpected change in the data” for claim 2. *Id.*, 62-64.

PO’s claim-4 arguments fail. PO’s argument that Ranum’s active scanners would not work in Veselov is another bodily-incorporation strawman. POR, 66-68. PO argues that Ranum’s hashes are not of a virtual cloud asset undergoing snapshot analysis. POR, 66-68. But this attacks the references individually. PO claims Ranum only evaluates running processes (POR, 67), but Ranum teaches comparing files. Pet., 61-62, 64-66; EX1093, 4:13-40, 22:2-61, 28:9-20. PO claims Ranum’s comparison baseline is not based on the target asset (POR, 66-67), but Ranum expressly teaches this. Pet., 62-66; EX1093, 16:47-57, 17:1-18:1, 22:2-34; EX1002, ¶¶263-65; EX1400, ¶66.

PO mischaracterizes Dr. Stavrou’s testimony. PO claims he was unable to explain the combination. POR, 64 (citing EX2172, 257:13-19). Not so. He rejected the questions’ bodily-incorporation framing and explained the references’ comparable data and usage. EX2172, 254:12-258:6. PO claims Dr. Stavrou refused to give precise answers. POR, 64-65 (citing EX2172, 272:21-276:2). But the full exchange shows the opposite. He was interrupted and criticized for explaining why he would not admit that Ranum lacks certain disclosures. EX2172,

271:3-273:8 (“Q. I mean, this could take an hour if -- if we have to go through....”). Dr. Stavrou appropriately responded that he would not be imprecise just to save time. *Id.*, 273:9-273:18; EX1400, ¶67 (explaining transcription error). PO claims Dr. Stavrou said clean systems may have malware. POR, 67 n.9 (citing EX2172, 264:6-266:18). In reality, Dr. Stavrou correctly disagreed when asked to admit that Ranum only examines network data and that baselines are not generated by scanning hosts. EX2172, 261:6-268:17; EX1093, 17:24-48.

V. GROUND 3-4

PO’s arguments against the Seo combinations fail. PO calls Wiz’s rationale generic (POR, 68) but ignores the specific motivating factors Wiz discussed. Pet., 66-68; EX1400, ¶68. PO argues that Seo “principally discusses” AI (POR, 68) but does not dispute Wiz’s analogous-art showing or the usefulness of Seo’s threat-determination teachings to snapshot analysis. Pet., 65-69; EX1400, ¶69. PO argues that Seo detects malware, which is not recited. POR, 68-69. But this attacks the references individually rather than addressing Wiz’s application of Seo’s teachings to the previously discussed threat determinations. Pet., 66-68; EX1400, ¶69; *see also supra*, §IV (rebutting same argument in Ground 2). PO claims Wiz cherry-picked Seo’s installation-record teachings without incorporating Seo’s AI aspects (POR, 69), but wholesale bodily incorporation is not the test, and

PO ignores Wiz’s rationale for using the applied teachings. Pet., 65-69; EX1400, ¶69.

VI. GROUNDS 5-6

PO argues that Hutchins teaches away because it analyzes instantiated VMs and that Wiz “selectively applied” quarantining without incorporating Hutchins’ instantiated-VM usage. POR, 69. But this bodily-incorporation strawman ignores the straightforward rationale for applying quarantining to snapshot-based assessments. Pet., 71-72; EX1400, ¶¶70-72.

VII. SECONDARY CONSIDERATIONS

PO’s secondary-considerations arguments fail. 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, it fails.

The presumption question is open and shut since PO never addresses coextensiveness. POR, 35-38; *Lectrosonics, Inc. v. Zaxcom, Inc.*, IPR2018-01129, Paper 33, 33 (precedential) (no presumption where patentee did not provide coextensiveness analysis).

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 snapshot, yet PO emphasizes automatically enumerating "every asset." EX2067, 8-9 (control-plane path); *see also* [REDACTED]

[REDACTED] PO argues that the claims do not encompass vulnerabilities (POR, 4, 17) but emphasizes its platform's vulnerability features. EX2067, 1, 4, 11-12, 16-19; [REDACTED]; EX1402, 76:11-77:10 (admitting

significance of vulnerability scanning); Shua-Dec, ¶45 (identifying three of seven data-plane steps as threat-detection); EX1400, ¶¶73-82.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Coextensiveness is further undercut by [REDACTED]

[REDACTED]. POR, 17 n.4. *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; IPR2024-01109, Paper 30, 30-67; IPR2024-01191, Paper 29, 33-65.

PO also fails its burden for the “embodiment” requirement. PO provides virtually no analysis. POR, 36-38; *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. The cited evidence does not show the alleged request. Shua-Dec, ¶¶31-33; EX1400, ¶83. [REDACTED]

[REDACTED]

[REDACTED]

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); *supra*, §VII.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, and it was known. *E.g.*, EX1002, ¶¶57, 88-89; EX1040, Abstract, ¶¶8-12, 23, 43-48, 52; EX1073, 1; EX1400, ¶¶84-85. PO cites cases involving secondary-considerations evidence tied to inventive combinations of features (POR, 33-34), but no evidence indicates that PO’s use of common techniques in agentless scans was innovative.⁴ To the contrary, the evidence shows that these were known features of agentless

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scanning. Cloud APIs were the backbone of cloud security, including agentless scanning. EX1400, ¶86 (citing EX1020, 21:9-43; EX1053, ¶¶79-94); *see also*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] PO touts sensitive-data detection and prioritized alerts (POR, 35, 42-43), but these were known for cloud-API-based agentless scanning. EX1400, ¶¶90-95. 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. PO alleges a vague need for “unobtrusive, comprehensive” cloud security and emphasizes agents’ limitations. POR, 34-35. But the alleged solution—agentless scanning—was known. *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, ¶¶85, 96-97. Indeed, there is little daylight between the touted features and Veselov. EX1400, ¶¶85-95, 98; *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”). High-level comments about “security” are not commensurate with the claims. EX1029, 1; EX2136, 2. Self-

interested statements are insufficient. POR, 34-35 (citing Shua-Dec, ¶¶80-91; EX1001; EX2082-2083; EX2099-2100); EX1402, 259:2-260:12 [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, ¶¶87-88 (companies “disagreed” that network/agent-based scanners were inadequate).

The alleged need for sensitive-data detection fails. PO selectively quotes EX2152 (POR, 35), but the full quote addresses “locating and classifying the entirety of an organization’s data,” not merely locating sensitive data. EX2152, 5. Regardless, the next sentence describes a company addressing this in 2018. *Id.*; *see also, id.*, 34, 41 (other pre-2019 companies detecting sensitive data). Dr. Stavrou confirms that disk-data-based threat detection was commonplace. EX1400, ¶¶89, 98.

PO also fails to prove 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, 35 (citing Shua-Dec, ¶¶14-25, 90-91). PO’s evidence refutes its assertion. EX2102, 1-2; EX2076, 10, 12-13, 23; EX1400, ¶¶99-100. An obscured portion of EX2076 states that companies who “once championed agentless solutions are now all building agents.” *Compare* EX1125, 2

with EX2076, 2. [REDACTED]
[REDACTED]

2. Skepticism

PO's skepticism arguments fail. Most evidence relates exclusively to "agentless" scanning, but this unrecited aspect was known. POR, 39-40; EX2076, 7-8; EX2106, 1; [REDACTED]; EX1400, ¶¶85, 101-05. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] *Auris Health, Inc. v. Intuitive Surgical Operations, Inc.*, 32 F.4th 1154, 1159 (Fed. Cir. 2022).

3. Praise

The "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.*, EX2123; EX1400, ¶¶106-07. Several so-called "awards" were sponsored by PO's investors, and PO commissioned the TAG Security Report (EX2118). EX1402, 173:7-184:1; EX1400, ¶108 (citing EX2129-2131; EX2145). Given the number of undisclosed relationships already discovered, it is difficult to know how pervasive the problem is.

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Regardless, PO's awards discussion is not connected to the claims. *Bosch Auto. Serv. Sols., LLC v. Matal*, 878 F.3d 1027 (Fed. Cir. 2017). PO does not establish a nexus presumption (*supra*, §VII.A), and PO's conclusory assertion of a connection is insufficient. POR, 42-43; EX1400, ¶109. Quoted statements relate exclusively to known/unrecited features such as the "agentless approach" (EX2123, 1-2; EX2124, 1) and "automatically" scanning "every discovered asset" (EX2119, 6-7). EX1400, ¶¶85, 110; *supra*, §§VII.A, VII.B.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Pet., 39-40;
EX1007, 2:27-41, 3:29-4:4, 5:1-5; EX1056, ¶¶38, 60-61, 66, 94; EX1078, ¶¶118, 181; EX1400, ¶¶85-95, [REDACTED]

PO's additional evidence fails. POR, 43. PO's 2024 article is not an "industry" statement. *Cf. Ingenico Inc. v. IOENGINE, LLC*, IPR2019-00929, Paper 53, 100-01; EX1400, ¶113. 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 involves cloud APIs and sensitive-data detection is irrelevant since that was known. EX2076, 11-12; EX1400, ¶¶85-88, 92-94. Additional quotes similarly describe the unrecited/known features discussed above. EX2118, 4-5; [REDACTED]; EX1400, ¶113.

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.⁵ With no evidence of actual copying, PO alleges "access and similarity," but PO's story has numerous flaws.

⁵ To the contrary, it is PO who has aggressively and systematically copied Wiz. EX1128, 42-50.

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PO's copying story does not withstand scrutiny. Discussing a 2019 meeting,
Mr. Shua provides [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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PO also falsely claims Wiz was unable to detect sensitive data until it introduced DSPM in 2022. POR, 45-50. In reality, sensitive-data protection was commonplace well before 2019 [REDACTED]

[REDACTED] EX1400, ¶¶92-94, [REDACTED]. [REDACTED]

PO's "access" accusations do not salvage its copying story. POR, 48-50;

[REDACTED] IPR2024-00220, Paper 9. Market monitoring—a standard competitive practice—is not indicative of copying. *Wm. Wrigley Jr. Co. v. Cadbury Adams USA LLC*, 683 F.3d 1356 (Fed. Cir. 2012); EX1400, ¶126;

[REDACTED] See also EX1128, 41 (counterclaim ¶¶14-15) (PO accessing Wiz's confidential documents). [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Regardless, PO fails to prove substantial similarity. PO outsources the analysis, but Dr. Kaeli’s testimony falls short. POR, 55-57. He identifies no “request,” does not explain his [REDACTED] argument, does not explain how Wiz “analyz[es] the snapshot,” and handwaves over elements 1.5-1.7. Kaeli-Dec, ¶¶277-91; EX1400, ¶127. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] PO’s own evidence and public statements emphasize the platforms’ differences. EX2076, 7-8, 21-26, 31; EX1126.

Regardless, PO fails to prove nexus. PO does not establish the presumption or show that the evidence is tied to recited/novel features. *Supra*, §§VII.A-B. Nor could it since the referenced features—e.g., cloud APIs, read-only access, block-

level analysis, sensitive-data detection, and prioritized alerts—were known in agentless scanning. *Supra*, §§III.B, VII.B; EX1400, ¶¶85-95, 130.

5. Commercial Success

PO's financing evidence fails. It consists of self-interested statements. POR, 58-60; *Bayer*, 713 F.3d at 1377. The alleged connection to the claims is conclusory and unsupported. POR, 59-60; EX1400, ¶¶131-33. Regardless, these techniques were known. EX1400, ¶¶85-95.

PO's revenue arguments fail. PO cites sales but does not establish a nexus presumption. POR, 60-61; *supra*, §VII.A; EX1400, ¶¶132-33. PO claims it would have earned more without competition from Wiz but only cites Mr. Shua's self-interested speculation. POR, 61; Shua-Dec, ¶111; EX1400, ¶134.

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, 60-62; *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) (must include "all competing" products); EX1402, 107:18-113:8, 118:17-123:10 (PO competes with agent-based platforms). PO's evidence shows minimal market share. EX2076, 21. Mr. Shua also effectively admits deterring others. Shua-Dec, ¶16; *Galderma Lab'ys, L.P. v. Tolmar, Inc.*, 737 F.3d 731, 740 (Fed. Cir. 2013) (deterrence makes evidence "weak").

PO's cursory discussion of Wiz's platform fails. PO makes no nexus showing. POR, 61-62; *SightSound Techs., LLC v. Apple Inc.*, 809 F.3d 1307, 1319 (Fed. Cir. 2015). PO alleges infringement (POR, 61), but earlier accusations of practicing the claims fall short. *Supra*, §VII.B.4. PO claims Wiz attributed its success to PO's approach (POR, 61-62), but PO's evidence says that "Wiz's true strength" was not agentless scanning but rather meeting customers' evolving needs. EX2076, 7-8; EX1400, ¶¶134-36. "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).

VIII. CONCLUSION

For the above reasons, claims 1-15 are unpatentable and should be canceled.

Respectfully submitted,

Dated: August 15, 2025

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

IX. 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 5,588 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

X. APPENDIX–PETITIONER’S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 11,740,926 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. 18/055,220 ('926 Pat.)
1005	Scheduling Order (Dkt. No. 33), <i>Orca security ltd. v. Wiz, Inc.</i> , No. 1:23cv-00758-GBW (DDE)
1006	Second Amended Complaint for Patent Infringement (Dkt. No. 15), <i>Orca security ltd. v. Wiz, Inc.</i> , 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 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)
1038	Suneja, “Exploring VM Introspection: Techniques and Trade-offs,” ACM, VEE’15 (Mar. 2015) http://dx.doi.org/10.1145/2731186.2731196

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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

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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
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1063	U.S. Publication No. 2014/0245376 A1 to Hibbert
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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’y’s Bull. Vol. 65 No. 1 (January 2017)
1080	U.S. Patent No. 7,831,739 B2 to Lambeth

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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.</i> , 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/
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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

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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” 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://dpcl.d.defense.gov/Privacy/About-the-Office/FAQs
1106	<i>Orca Security Ltd., v. Wiz, Inc., C.A. No. 23-758-JLH – Doc. 170 Wiz, Inc.’s Stipulation Concerning Invalidity Grounds (October 10, 2024)</i>
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 [<i>served, not filed</i>]
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1109	Archived copy of “State of California: California Technology Agency Infrastructure Consolidation Program Server, Virtualization, Backup

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	and Storage Workgroup,” published by the California Department of Technology on December 19, 2017, by the Internet Organization’s “Wayback Machine” 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)
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)
1120	Dr. Kaeli deposition exhibit of US Patent No. 10,956,242 (June 19, 2025)

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Exhibit No.	Description
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)
1129	Michael et al. US Patent No. 8,011,010 B2 (April 17, 2007)
1130	Intentionally Left Blank

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Exhibit No.	Description
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
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)

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Exhibit No.	Description
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]
1408	[REDACTED] [PROTECTIVE ORDER MATERIAL]
1409	[REDACTED] [PROTECTIVE ORDER MATERIAL]

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Exhibit No.	Description
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:

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Dated: August 15, 2025

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