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Subject: IPR2024-00863, IPR2024-00864, IPR2024-00865, IPR2024-01109, IPR2024-01190, IPR2024-01191 - Patent Owner's Request for Authorization to File a Motion for Additional Discovery
Date: Tuesday, February 25, 2025 10:42:16 AM

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Dear Honorable Board,

Patent Owner Orca Security Ltd. ("Orca") respectfully requests authorization to file a motion for additional discovery in IPR Nos. IPR2024-00863, -00864, -00865, -01109, -01190, -01191 (collectively, "these Proceedings"). Specifically, every Ground in these Proceedings is based on obviousness, and Orca seeks discovery of certain documents that Petitioner Wiz, Inc. ("Wiz") produced in district court litigation, wherein Orca contends the requested documents demonstrate objective indicia of nonobviousness of the challenged claims, including skepticism of Orca's claimed inventions, industry praise for Orca's inventions, and Wiz's copying of Orca's inventions claimed in each of the challenged patents. Orca's authorized motion would demonstrate that the additional discovery is "necessary in the interest of justice" (35 U.S.C. § 316(a)(5)) and that each *Garmin* factor is met, including because Orca has already specifically identified each of the requested documents but cannot generate or assemble their equivalents without additional discovery because Wiz produced the documents as "CONFIDENTIAL" or "CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the district court protective order.

The parties have already negotiated and agreed to a proposed protective order for confidential documents in these proceedings. On February 7, Orca identified its request for additional discovery to Wiz and attempted to reach agreement, through multiple email and phone communications with Wiz, but Wiz has refused to indicate whether it will produce any documents requested by Orca.

Wiz has indicated it opposes Orca's request for authorization to file a motion for additional discovery.

Counsel for the parties are available at the following times for a conference call with the panel:

- Wednesday, February 26, between 3:00 PM and 5:00 PM Eastern
- Friday, February 28, between 11:30 AM and 1:00 PM Eastern

Best regards,

Raghav Bajaj
Counsel for Patent Owner

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