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To: Raghav.Bajaj@lw.com; [Trials](#)
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Subject: RE: IPR2024-01109, -01190, -01191 - Evidence Responsive to Board's Oral Hearing Questions
Date: Wednesday, October 22, 2025 10:22:14 AM
Attachments: [image001.png](#)

Counsel,

Patent owner may submit copies of U.S. Patents 11,516,231 and 11,431,735 as exhibits. The Board will also enter the email below as an exhibit.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
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From: Raghav.Bajaj@lw.com <Raghav.Bajaj@lw.com>
Sent: Monday, October 20, 2025 12:02 PM
To: [Trials](#) <Trials@USPTO.GOV>
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Dear Honorable Board,

The parties jointly write to address an issue raised during oral argument. During last Tuesday's oral hearing in the above-listed proceedings, the Board asked counsel for both parties whether any other Orca patents in the same family as the '809, '926, and '326 patents included claims directed to the specification embodiment discussing "instantiat[ing] a copy of a VM." See '809 patent 5:55-59, 7:47-49.

At least claims 7 and 17 of Orca's U.S. Patent 11,516,231 (the "'231 patent") and claims 7 and 17 of Orca's U.S. Patent 11,431,735 (the "'735 patent"), as well as the claims they depend from, are relevant to the Board's questions.

Orca provides the additional statement and request in the paragraphs below; Wiz opposes the inclusion of the additional statement and request.

The '231 patent issued from U.S. Application 17/330,998, which is the parent application that the '809, '926, and '326 patents claim priority to, and the '735 patent issued from the grandparent application (U.S. Application 16/585,967).

Orca respectfully requests leave to submit U.S. Patents 11,516,231 and 11,431,735 as exhibits, or in the alternative, that the Board enter the patents as exhibits in the 3000 series.

Best regards,

Raghav Bajaj
Counsel for Patent Owner

Raghav Bajaj

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