

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WIZ, INC.,
Petitioner,

v.

ORCA SECURITY LTD.,
Patent Owner.

IPR2024-01191
Patent 11,775,326

**JOINT MOTION TO TERMINATE
INTER PARTES REVIEW**

Patent Owner Orca Security Ltd. and Petitioner Wiz, Inc. (collectively, “the Parties”) have reached a settlement. Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. §§ 42.72 and 42.74, the Parties jointly request termination of this *inter partes* review of U.S. Patent No. 11,775,326 (“Patent-in-Suit”). The Parties were authorized to file this Joint Motion by the Board via email on January 6, 2026.

As required under 35 U.S.C. § 317(b) and 37 C.F.R. §§ 42.74(b), a true copy of the confidential settlement agreement (Ex. 2429) that resolves the disputes in this *inter partes* review relating to the Patent-in-Suit is filed herewith as a confidential exhibit. There are no other collateral agreements, whether written or oral, between the Parties made in connection with, or in contemplation of, the termination sought. Exhibit 2429 forms the complete agreement resolving the disputes in the *inter partes* review between the Parties. The Parties have conferred on this matter, and the Parties are in agreement with this procedure.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), the Parties are concurrently filing a Joint Request to Keep Separate, which asks the Board to treat the agreement as business confidential information, and to keep it separate from the files of this proceeding and the files of the Patent-in-Suit.

I.Statement Of Precise Relief Requested

The Parties jointly request that the Board terminate this *inter partes* review in its entirety.

II.Reasons Why Termination Is Appropriate

The Parties have reached an agreement resolving the underlying dispute in this *inter partes* review proceeding. Ex. 2429. Accordingly, termination of this *inter partes* review proceeding is appropriate because all disputes between the Parties regarding the Patent-in-Suit have been resolved. Motions to terminate based on a joint request are routinely granted in the pre-final written decision time frame after an oral hearing has been held. *See, e.g., Comcast Cable Communications, LLC v. Rovi Guides, Inc.*, IPR2019-01431, Paper 39 at 2 (PTAB Nov. 20, 2020) (terminating case after oral argument given parties settlement and agreeing with the parties that terminating proceeding would serve the interests of judicial economy and the mutual interest of the parties); *Cox Communications, Inc. v. AT&T Intellectual Property II, L.P.*, IPR2015-01536, Paper 65 at 2 (PTAB Dec. 8, 2016) (terminating case after oral argument given parties' settlement and noting "[w]hen, as here, we have not entered a Final Written Decision on the merits, we generally expect that trial will terminate after the filing of a settlement agreement."); *Office Patent Trial Practice Guide*, 77 Fed. Reg. 48,756, 48,768 (Aug. 14, 2012) ("There are strong public policy reasons to favor settlement between the parties to a proceeding."). As a final written decision has not issued, termination is appropriate.

III. Conclusion

The Parties have settled all disputes relating to the Patent-in-Suit, and the Board has not issued a final written decision on the merits in this proceeding. Accordingly, the Parties respectfully request the Board to terminate this proceeding in its entirety.

Respectfully submitted,

Dated: January 7, 2026

By: / Raghav Bajaj /

Raghav Bajaj (Reg. No. 66,630)
raghav.bajaj@lw.com
Latham & Watkins LLP
300 Colorado St., Suite 2400
Austin, TX 78701-3295
Telephone: 737.910.7300
Fax: 737.910.7301

*Counsel for Patent Owner
Orca Security Ltd.*

Respectfully submitted,

Dated: January 7, 2026

By: / Matthew A. Argenti /

Matthew A. Argenti (Reg. No. 61,836)
margenti@wsgr.com
Wilson Sonsini Goodrich & Rosati
650 Page Mill Road
Palo Alto, CA 94304
Tel: 650-354-4154
Fax: 650-493-6811

*Counsel for Petitioner
Wiz, Inc.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 7th day of January, 2026, a true and correct copy of the foregoing **Joint Motion to Terminate *Inter Partes* Review** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

Matthew A. Argenti (Reg. No. 61,836)
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304
Tel.: 650.354.4154
Fax: 650.493.6811
margenti@wsgr.com

Michael T. Rosato (Reg. No. 52,182)
WILSON SONSINI GOODRICH & ROSATI
701 Fifth Avenue, Suite 5100
Seattle, WA 98104
Tel.: 206-883-2529
Fax: 206-883-2699
mrosato@wsgr.com

Wesley E. Derryberry (Reg. No. 71,594)
Tasha M. Thomas (Reg. No. 73,207)
Joseph M. Baillargeon (Reg. No. 79,685)
WILSON SONSINI GOODRICH & ROSATI
1700 K Street, NW, Fifth Floor
Washington, DC 20006
Tel.: 202-973-8947
Fax: 202-973-8899
wderryberry@wsgr.com
tthomas@wsgr.com
jbailargeon@wsgr.com

By: / Raghav Bajaj /

Raghav Bajaj (Reg. No. 66,630)
raghav.bajaj@lw.com
Latham & Watkins LLP
300 Colorado St., Suite 2400
Austin, TX 78701-3295
Telephone: 737.910.7300
Fax: 737.910.7301

*Counsel for Patent Owner
Orca Security Ltd.*