

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ORCA SECURITY LTD,
Petitioner,

v.

WIZ, INC.,
Patent Owner.

IPR2025-01084
Patent 11,929,896

**PATENT OWNER WIZ, INC.'S
PRELIMINARY RESPONSE**

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I. INTRODUCTION

Patent Owner Wiz, Inc. requests denial of *inter partes* review of the involved U.S. Patent No. 11,929,896 (“Shemesh’896”). Petitioner Orca Security Ltd. has failed to demonstrate a reasonable likelihood that at least one of the claims challenged in the petition is unpatentable. 35 U.S.C. §324(a).

The petition’s sole ground of challenge, which applies a combination of three references (Ross (EX1004), Agarwal (EX1005), and Biran (EX1006)) to the claims of the challenged Shemesh’896 patent, fails for numerous reasons. For example, while the petition alleges that the applied references teach the claim requirement of *genericizing each of*¹ a plurality of network entities deployed in a plurality of cloud computing platforms *to generate a plurality of generic network entities*, the petition fails to point to any disclosure in the references that disclose genericization of a network entity, instead relying on disclosures that describe classifying, clustering, or grouping of workloads or nodes. However, the petition provides no explanation as to why description of classifying, clustering, or grouping satisfies the claimed *genericizing* under its plain and ordinary meaning in

¹ For convenience, Wiz adopts Patent Owner’s convention of denoting claim language with italics. Pet. 11 n.3.

light of the Shemesh'896 specification, nor does the petition offer a claim construction for the term. By failing to provide this analysis, the petition is deficient in specifying where each element of the claim is found in the prior art.

Other deficiencies in the analysis further demonstrate that the petition fails to satisfy Petitioner's burden in establishing a reasonable likelihood of unpatentability. For example, the petition never identifies disclosure in the applied references describing a network graph that is *a multi-dimensional data structure* and instead relies on conclusory and unsupported expert testimony to gap-fill this missing limitation. The petition also engages in hindsight to assert that a POSITA would have sought to *creat[e] at least one imputed entity* by grouping host-less components, such as host-less load balancers, despite none of the references suggesting such a specific grouping. Further evidencing hindsight is the petition's insufficient rationale to combine the applied references, which fails to account for Ross's teachings regarding its own specific methods for achieving improved visualization.

Accordingly, for the reasons detailed below, the Board should deny institution of the petition.

II. CLAIM CONSTRUCTION

In an IPR, claims are given their ordinary and customary meaning in light of the specification. 37 CFR §42.100(b). The petition proffers a construction for the

term *imputed entity* recited in the claims of Shemesh’896 but does not otherwise offer constructions for other claim terms. Pet., 6-7; *see also* EX1003, ¶19 (Petitioner’s expert purporting to interpret the patent claims “according to their ‘ordinary and customary meaning’”). While Patent Owner submits that no constructions are necessary to deny institution, the petition’s failure to offer a claim construction for the term *genericizing each of the network entities* renders its analysis deficient.

Specifically, as explained in further detail below, the references applied by the petition—namely Ross, Agarwal, and Biran—fail to refer to “genericizing” a network entity. Instead, the petition relies on disclosure describing classifying, clustering, or grouping of workloads or nodes as allegedly satisfying the claim limitation. *Infra*, §III.A.1. However, Shemesh’896 does not use classifying, clustering, or grouping when describing the *genericizing* of the claimed invention, nor does the petition offer a construction for the term. *See, e.g.*, EX1001, 9:57-60 (“Genericization at S220 includes ... converting specific objects into generic objects, or generating new generic objects based on specific objects, or a combination thereof.”), 16:14-16 (“The genericization of an object ... is the process of generating a generic object 420 from a specific object 410.”), FIG. 4. The petition fails to sufficiently explain why the plain and ordinary meaning of the term *genericizing*, viewed in light of the specification, would have been understood

to include the classifying, clustering, or grouping described in the applied references.

For this reason, the petition's failure to meaningfully address claim construction undermines its superficial attempt to map the prior art to the challenged claims. The petition is thus deficient for failing to specify how the prior art maps to the express limitations of the challenged claims.

III. ANALYSIS

A. Ground 1: The Petition Fails to Establish that the Challenged Claims Are Obvious

Ground 1 of the petition challenges claims 1-29 as obvious based on a proposed combination of Ross (EX1004), Agarwal (EX1005), and Biran (EX1006). Pet., 6. The petition fails to meet its burden in showing that the combination of Ross, Agarwal, and Biran renders these claims obvious because the petition fails to show that the proposed combination teaches each and every limitation of independent claim 1, including limitations 1[b], 1[c], and 1[d],² and their corresponding limitations in independent claims 14 and 15. The petition also fails to provide a sufficient rationale explaining why a POSITA would have been

² Petitioner's labeling for the claim limitations is used in this preliminary response.

motivated to combine Ross, Agarwal, and Biran to arrive at the claimed invention.

1. The petition fails to show that the proposed combination teaches each and every limitation of independent claim 1

a. The petition fails to show that the combination of Ross, Agarwal, and Biran teaches limitation 1[b]

Limitation 1[b] requires *genericizing each of the network entities based on the respective collected network entity data to generate a plurality of generic network entities, wherein a generic network entity includes a generic representation of respective network entities from different cloud computing platforms of the plurality of cloud computing platforms*. The petition alleges “Ross alone or in view of Agarwal discloses limitation 1[b].” Pet., 16. As detailed below, the petition fails to establish that either Ross alone or Ross in view of Agarwal discloses each of the elements of limitation 1[b].

i. The petition fails to establish that Ross alone discloses limitation 1[b]

First, the petition fails to establish that “Ross alone” discloses each of the elements recited in limitation 1[b]. Pet., 16. As an initial matter, the petition does not establish, or even allege, that Ross discloses generating *a plurality of generic network entities that includes a generic representation of respective network entities from different cloud computing platforms*, as required by the claim.

Instead, the petition only asserts that a POSITA “would have understood Ross to teach, or at the very suggest, genericizing workloads based on collected network

entity data, including from different cloud computing platforms” and concedes “Ross does not disclose the specifics of any generic network entity that results from such genericizing.” Pet., 18; *see also id.*, 16 (asserting only that “Ross teaches or suggests” genericizing each of the network entities based on collected network entity data). Thus, at minimum, the petition fails to show that “Ross alone” discloses limitation 1[b] because it fails to establish that Ross generates *a plurality of generic network entities* as recited in the claim.

The petition also fails to show how Ross discloses *genericizing each of the network entities*. The petition concedes that Ross does not disclose *genericizing* each of its workloads (which the petition maps to the claimed network entities). *See* Pet., Instead, the petition only argues that Ross teaches *genericizing* when Ross describes “classifying into groups, clustering together, and/or forming into communities” its workloads, but the petition fails to sufficiently explain how each of these actions constitute *genericizing* a workload. Pet., 16 (citing EX1004, 5:64-6:48). For example, the petition argues that “Ross discloses classifying each workload node in graph database 225 into groups.” *Id.* (citing EX1004, 5:64-6:6). However, other than relying on Ross’s description of “classify[ing] what a particular node is,” the petition fails to explain how making a determination that a workload node belongs to a certain group (*e.g.*, a database management system) constitutes ***genericizing*** that workload. *Cf.* EX1001, 16:14-16 (“The genericization

of an object, as depicted in the illustration 400, is the process of generating a generic object 420 from a specific object 410.”). Petitioner’s expert similarly fails to bridge the gap between Ross’s disclosure of classifying nodes to the claimed *genericizing*. See EX1003, ¶92 (only quoting EX1004, 5:67-6:9).

Similarly, the petition also contends that “Ross discloses clustering together workload nodes that behave similarly” and “further discloses identifying ‘communities’ consisting of workloads.” Pet., 17 (citing EX1004, 6:21-48). Ross discusses clustering nodes or identifying communities as part of “visually organiz[ing] information from graph database 225”—for example, clustered nodes “can be visually presented as a shape (e.g., circle, rectangle, and the linked) which denotes that there are a certain number of workloads fulfilling the same function, instead of presenting a shape for each workload in the cluster.” EX1004, 6:21-48. However, other than citing to Ross’s disclosure, the petition fails to explain how “visually organiz[ing] information” into clusters or communities as shown to the user constitutes genericizing the workload itself. See Pet., 17; *see also* EX1003, ¶¶93-94 (similarly identifying Ross’s clusters or communities without additional explanation). Notably, Shemesh’896 discusses genericizing network entities independent of any graph visualization provided to the user. See, e.g., EX1001, 9:17-10:57 (discussing genericization of S220 of FIG. 2), 13:57-15:55 (discussing graph visualization 300 of FIG. 3).

Moreover, even if Petitioner had demonstrated that Ross’s disclosure of classifying, clustering, or grouping satisfies the claimed *genericizing*, the petition fails to establish that Ross teaches classifying, clustering, or grouping together *respective network entities from different cloud computing platforms*. The petition asserts that because Ross’s cloud computing environment 100, which includes workloads, “can be hosted by more than one cloud service” (EX1004, 2:54-3:6), “[a] POSITA would have understood or found obvious that Ross’s disclosed classification/clustering/community grouping is across all workloads from which data is collected, and thus workloads of different cloud service providers are classified/clustered/grouped together so long as they, for example, run the same application or perform the same function.” Pet., 17-18. However, despite Petitioner’s attempt at gap-filling, Ross does not disclose classifying/clustering/grouping workloads of different cloud service providers together. See EX1004, 5:54-6:48. Ross instead describes analyzing the particular relationships of the workload—for example, by clustering nodes that “have similar edges (relationships)” or presenting communities of workloads “that have a close set of edges (relationships).” See *id.* The petition does not explain why clustering or grouping workloads based on “similar edges” or “a close set of edges” would result in the grouping together of workloads provided by different (and unrelated) cloud service providers, nor does the petition explain why a POSITA, in view of

Ross's description, would have sought to group workloads in such a manner. *Id.*. The petition's conclusory assertion otherwise is thus evidence of hindsight. *See also* EX1003, ¶96 (providing similar conclusory assertions).

Accordingly, the petition fails to establish that Ross alone discloses each of the elements recited in limitation 1[b].

ii. The petition fails to establish that Ross in view of Agarwal discloses limitation 1[b]

The petition also fails to establish that Ross "in view of Agarwal" discloses the elements of limitation 1[b]. The petition asserts that "Agarwal expressly discloses" genericizing network entities based on collected network entity data to generate a plurality of generic network entities that include a generic representation of respective network entities. Pet., 18. According to the petition, Agarwal discloses generic network entities in the form of "node groups," which are "a generic representation of respective network entities" because the node groups "include properties that are common to specific nodes that are part of the group." *Id.*, 18, 20. The petition specifically points to Agarwal's "Test Case 1" as illustrating a generated node group. *Id.*, 20-21.

The petition fails to establish that Agarwal discloses *genericizing each of the network entities ... to generate a plurality of generic network entities* as claimed because Agarwal discloses that its node groups are generated before any nodes satisfying the criteria of a particular node group are sorted into the group. This is

illustrated in Agarwal’s Test Case 1. As Agarwal explains, a user “[c]reate[s] a Group Family by clicking on ‘Create Family’ in the Group Manager tab,” where certain “characteristics can be selected to group on.” EX1005, 24:24-31, FIG. 22. Once created, nodes matching the selected characteristics are then added to the respective group. *Id.*, 24:32-46; *see also id.*, 15:45-16:1 (stating “a user can select what characteristics that are used to group” and, “[b]ased on the selected characteristics, the nodes that have similar values will be grouped together”). However, the petition fails to explain how provisioning nodes that meet certain criteria into defined node groups constitutes *genericizing each of the network entities ... to generate a plurality of generic network entities*, as recited. *Compare* EX1005, 16:18-22 (stating “nodes are sorted into family groups”), 16:30-31 (stating “nodes can be organized per group”), FIG. 8, *with* EX1001, 9:17-31 (describing “the conversion of existing specific network entities into generic network entities”), 10:16-57 (describing “generic entities may be generated, or converted from corresponding specific entities, or both, at S220, providing for the genericization of such specific entities in a unified format”), FIG. 4.

Moreover, the petition fails to cure its deficiencies with respect to Ross discussed above in showing *a generic representation of respective network entities from different cloud computing platforms*. *Supra*, §III.A.1.a.i. The petition does not allege that Agarwal’s node groups satisfy this limitation on their own. *Pet.*, 18-21

(alleging only that “each of Agarwal’s node groups is *a generic representation of respective generic entities*” without mention of *different cloud computing platforms*). Indeed, Agarwal only describes collecting data associated with resources provided by a single cloud provider. See EX1005, 14:10-14 (describing data collection “associated with a user’s resources in the Amazon Web Services™ (AWS) cloud infrastructure”), 24:6-9 (grouping “instances in AWS environment”).

The petition attempts to bridge this missing element based on an alleged motivation “to group similar workload nodes across cloud service providers ... to simplify the visualization, management, and security of complex cloud environments” (Pet., 22), but the petition’s analysis is insufficient. As noted above, Ross already discusses means to “visually organize information from graph database 225” through clustering or grouping workloads based on similar edges or close sets of edges between workloads. EX1004, 6:21-48; *supra*, §III.A.1.a.i. Thus, to the extent the references provide any suggestion to group workloads in order “to simplify the visualization, management, and security of complex cloud environments,” it is with respect to nodes that “have similar edges (relationships)” or “that have a close set of edges (relationships)” as taught by Ross. EX1004, 5:54-6:48. As explained above, the petition does not explain why a POSITA would have understood this to mean that workloads from different cloud service providers would be grouped together or would have sought to group workloads in such a

manner in view of Ross’s disclosure.

Accordingly, the petition fails to establish that Ross in view of Agarwal discloses each of the elements recited in limitation 1[b].

b. The petition fails to show that the combination of Ross, Agarwal, and Biran teaches limitation 1[c]

Limitation 1[c] requires *generating at least a network graph, wherein the generated network graph is a multi-dimensional data structure providing a representation of the plurality of generic network entities and relations between the generic network entities of the plurality of network entities*. The petition alleges that “Ross in view of Agarwal discloses limitation 1[c].” Pet., 22.

The petition fails to establish that Ross in view of Agarwal discloses the elements of limitation 1[c] because the petition improperly relies on the conclusory testimony of its expert to gap-fill express elements of the limitation. For example, limitation 1[c] requires that *the generated network graph is a multi-dimensional data structure*. The petition alleges that Ross teaches generating a network graph in the form of a “graph database.” Pet., 22-23. However, Ross does not characterize its graph database as a multi-dimensional data structure. *See* EX1004, 4:66-5:20. The petition instead alleges that “[a] POSITA would have understood that creating and updating a graph database, as described in Ross, constitutes generating a network graph that is a multi-dimensional data structure.” Pet., 23. The only support cited for this assertion is the testimony of Petitioner’s expert, which makes

the same conclusory assertion without providing any additional supporting evidence or technical reasoning. *Id.* (citing EX1003, ¶¶109-10); *see also Xerox Corp. v. Bytemark, Inc.*, IPR2022-00624, Paper 9 at 15 (precedential) (finding citation to declaration testimony that repeats petition’s conclusory assertion without “any additional supporting evidence or provid[ing] any technical reasoning to support [the] statement” is entitled to little weight); 37 C.F.R. §42.104(b)(4) (IPR petitions “must specify where each element of the claim is found in the prior art patents or printed publications relied upon”). As such, the basis for the petition’s assertion that the *multi-dimensional data structure* requirement is satisfied is unknown, leaving Wiz unable to respond other than to point out the complete absence of explanation.

The petition similarly advances conclusory arguments with respect to Agarwal. Specifically, the petition relies on Agarwal’s “Orient DB” (Pet., 27), illustrated in Agarwal’s FIG. 21 and described as “show[ing] a configuration of a test case,” but not otherwise described in detail in the specification. *See* EX1005, 3:55-56, 23:51-64, FIG. 21. Nevertheless, based solely on the testimony of its expert, the petition asserts that “a POSITA would have understood Agarwal to teach a multi-dimensional data structure (e.g., Orient DB) providing a representation of generic network entities (e.g., node groups) and relations between them (e.g., flow groups).” Pet., 27 (citing EX1003, ¶¶115-20). Petitioner’s gap-

filling—turning to its expert and additional exhibits for disclosure not found in the grounds references—should be rejected. In any, event, the petition never identifies what aspect of the combination teaches the claimed *generating at least one network graph* aspect of the claims. Petitioner contends a Grouping Manager creates “groups of nodes” which are output to a TGraph Server “to represent a cloud infrastructure as a graph,” where the TGraph Server’s “output is to ‘OrientDB.’” Pet., 27. While the petition asserts the claimed *multi-dimensional data structure* corresponds to “OrientDB,” it never identifies whether, e.g., the TGraph Server is alleged to generate the graph (which would entail generating OrientDB in Petitioner’s mapping) or whether OrientDB is alleged to generate itself. *Id.* Petitioner’s expert largely repeats the petition’s arguments without providing additional supporting evidence or technical reasoning. See EX003, ¶118.

Accordingly, the petition fails to establish that Ross in view of Agarwal discloses each of the elements recited in limitation 1[c].

c. The petition fails to show that the combination of Ross, Agarwal, and Biran teaches limitation 1[d]

Limitation 1[d] requires *creating at least one imputed entity, wherein the at least one imputed entity is a generic network entity representing an executed platform functionality, and wherein the executed platform functionality is different than a network entity*. The petition alleges that “Ross in view of Agarwal and Biran

discloses” limitation 1[d]. Pet., 28.

The petition argues that the references disclose the elements of limitation 1[d] because (1) “a POSITA would have found it obvious and been motivated to include host-less component information in Ross’s CMDB and to collect it in view of the express teachings of Biran,” and (2) “when implemented to gather information on host-less components, a POSITA would have found it obvious and been motivated to create at least one group of similar host-less components, thereby creating at least one imputed entity.” Pet., 29, 32. As explained below, the petition fails to show that the combined references disclose *creating at least one imputed entity* as recited by limitation 1[d].

The petition relies on Biran solely for its alleged disclosure of discovering “host-less components,” such as Platform as a Service (PaaS) services. Pet., 29-32. The petition does not allege that Biran discloses creating an imputed entity that is a generic network entity representing an executed platform functionality, nor does Biran do so. *See id.*, 32-34. Instead, the petition asserts that “a POSITA would have found it obvious and been motivated to create a group of such transparent assets [such as host-less, elastic load balancers], particularly in view of Agarwal’s express suggestion to create a group of similar virtual load balancers and other network service resources.” *Id.*, 33. However, the petition fails to point to any disclosure in Agarwal that expressly suggests creating a group of load balancers,

much less a group of host-less load balancers (as opposed to a group containing both host-based and host-less load balancers). *See* Pet., 33. Moreover, the petition’s contentions that (1) Agarwal “broadly teaches” creating node groups of cloud resources, (2) such resources can include a virtual load balancer and other network service resources, and (3) this would have led a POSITA to provide “a group of similar virtual load balancers and other network service resources” (*id.*) is insufficient for reasons similar to those discussed with respect limitation 1[b]. That is, as noted above, Ross teaches clustering or grouping workloads based on similar or close sets of relationships and the petition does not explain why a POSITA would have been motivated to create a group of host-less components in view of these teachings. *See* EX1004, 6:21-48.

Accordingly, the petition fails to establish that Ross in view of Agarwal discloses each of the elements recited in limitation 1[d].

2. The petition fails to establish a sufficient rationale to combine Ross, Agarwal, and Biran

The petition also fails to sufficiently explain why a POSITA would have been motivated to combine Ross, Agarwal, and Biran to arrive at the claimed invention. As explained below, the petition presents an incomplete *Graham* analysis that fails to address the claimed invention as a whole. *Graham v. John Deere Co.*, 383 U.S. 1 (1966). It also advances a motivation to combine that fails to address specific teachings in Ross regarding its own specific methods for

organizing visual information.

First, the petition's rationale to combine is insufficient because it presents an incomplete *Graham* analysis that addresses the limitations of the claims in isolation, rather than explaining why a POSITA would have found it obvious to combine the references' teachings to arrive at the claimed invention as a whole. *See* 35 U.S.C. §103 (obviousness requires a showing that "the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious"); *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 406 (2007). Specifically, the petition addresses motivation to combine on a piecemeal basis—for example, asserting that a POSITA would have been motivated to combine Ross and Agarwal to arrive at the elements recited in limitations 1[b]-[c] and separately asserting that a POSITA would have been motivated to combine Ross and Biran to arrive at the elements recited in limitation 1[d]. *See* Pet., 29. The deficiency to this piecemeal approach is highlighted by the petition's inconsistent reliance on the references as teaching certain claim elements and incomplete analysis.

For example, for limitation 1[c], the petition argues that "a POSITA would have found Ross to teach or suggest that the graph database provides a representation of the plurality of generic network entities," even though the petition does not allege that Ross even teaches or suggests the plurality of generic

network entities recited in limitation 1[b]. Pet., 23; *see also id.*, 25 (alleging “the disclosures of Ross alone” render limitation 1[c] obvious). Elsewhere, the petition inconsistently applies a “combined Ross-Agarwal system” and a “combined Ross-Agarwal-Biran system” to the claims without explaining how the two combinations relate. Pet., 37-38. In addition, for limitation 1[a], the petition purports to apply a combination of Ross and Agarwal without actually applying Agarwal, instead generally referencing a “combined Ross-Agarwal system” and citing to its expert and other claim elements as a basis. *Id.*, 15. Moreover, for limitation 1[b], while the petition alleges a motivation to “implement the Ross system to genericize network entities as taught by Agarwal,” it fails to allege that a POSITA would have had a reasonable expectation of success in combining the references as proposed. *Id.*, 21-22; *cf. id.*, 28 (alleging a reasonable expectation of success for limitation 1[c]), 32 (same for limitation 1[d]).

Second, the petition’s rationale to combine is deficient because it fails to sufficiently address the references’ teachings. For example, with respect to Ross and Agarwal, the petition asserts that “[a] POSITA would have been motivated to implement the genericizing teachings of Agarwal into Ross for ease of visual representation to a user.” Pet., 21-22. However, the petition fails to acknowledge that Ross incorporates its own methods for “visually organiz[ing] information from graph database 225” by clustering nodes that “have similar edges (relationships

and behave in a similar fashion” and presenting communities of workloads “that have a close set of edges (relationships).” EX1004, 21-48. The petition does not explain why a POSITA would have been motivated to implement Agarwal’s teachings into Ross for ease of visual representation when Ross already incorporates specific methods for providing such functionality, nor does the petition allege that Agarwal’s methods would be an improvement over Ross’s teachings. Similarly, as explained above in §III.A.1.c, the petition also fails to explain why, in view of Ross’s methods for organizing visual information, which discusses clustering or grouping workloads based on similar or close sets of relationships, a POSITA would have sought to particularly group imputed entities (*e.g.*, host-less load balancers).

Accordingly, for at least the above reasons, the petition fails to meet its burden in establishing that the combination of Ross, Agarwal, and Biran renders obvious independent claim 1.

3. The petition fails to show that the proposed combination renders obvious independent claims 14-15

The petition incorporates by reference its claim 1 analysis for independent claims 14 and 15, including the limitations discussed above. *See* Pet., 48-52.

Accordingly, for the same reasons discussed above with respect to independent claim 1, the petition also fails to establish that the combination of Ross, Agarwal, and Biran renders obvious independent claims 14 and 15.

4. The petition fails to show that the proposed combination renders obvious dependent claims 2-13 and 16-29

The petition also fails to meet its burden with respect to each of dependent claims 2-13 and 16-29 for at least the reasons discussed above with respect to independent claims 1 and 15.

IV. CONCLUSION

Petitioner has failed to make a facial case of unpatentability for any challenged claim, so institution is unwarranted and should be denied.

Respectfully submitted,

Date: September 26, 2025

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CERTIFICATION UNDER 37 C.F.R. §42.24(d)

I certify the word count for this reply is 4333 words, excluding any table of contents, table of authorities, mandatory notices, certificate of service or word count, and appendix of exhibits or claim listing.

Date: September 26, 2025

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