UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ORCA SECURITY LTD,
Petitioner

v.

WIZ, INC.,
Patent Owner

Inter Partes Review Case No. IPR2025-01083
U.S. Patent No. 11,722,554

Inter Partes Review Case No. IPR2025-01084
U.S. Patent No. 11,929,896

Inter Partes Review Case No. IPR2025-01085
U.S. Patent No. 11,936,693

Inter Partes Review Case No. IPR2025-01086
U.S. Patent No. 12,001,549

Inter Partes Review Case No. IPR2025-01087
U.S. Patent No. 12,003,529

NOTICE OF SOTERA STIPULATION
OF PETITIONER ORCA SECURITY LTD.

The following patents are currently the subject of stayed district litigation between Petitioner Orca Security Ltd. ("Orca") and Patent Owner Wiz, Inc.: *Orca Security Ltd. v. Wiz, Inc.*, No. 1:23-CV-00758 (D. Del.).

IPR No.	Patent No.	IPR Petition Filed	Claims Challenged
IPR2025-01083	U.S. 11,722,554	June 4, 2025	1-5, 7-16, and 18-21
IPR2025-01084	U.S. 11,929,896	June 4, 2025	1-29
IPR2025-01085	U.S. 11,936,693	June 4, 2025	1-21
IPR2025-01086	U.S. 12,001,549	June 4, 2025	1-5, 11-16
IPR2025-01087	U.S. 12,003,529	June 4, 2025	1-17

With respect to the above-identified district court litigation, Orca hereby submits the following *Sotera* stipulations in connection with each of the IPR petitions identified in the table above. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) ("*Sotera*") (describing the standard *Sotera* stipulation). Orca's *Sotera* stipulations below are not intended and should not be construed to limit Orca's ability to assert invalidity of any claims of the patents-at-issue in the identified district court litigation based on any other ground.

Stipulation for U.S. Patent No. 11,722,554

Orca hereby stipulates, in view of the instant IPR (IPR2025-01083) against Wiz's U.S. Patent No. 11,722,554 filed before the PTAB, that if the PTAB institutes an IPR (and does not subsequently vacate institution) based on Orca's Petition, Orca will not raise or pursue (i) the specific grounds raised in IPR2025-01083, or (ii) any other grounds that could have reasonably been raised before the PTAB (i.e., any ground that could have reasonably been raised under §§ 102

or 103 on the basis of only prior art patents or printed publications) in the above-identified district court litigation.

Stipulation for U.S. Patent No. 11,929,896

Orca hereby stipulates, in view of the instant IPR (IPR2025-01084) against Wiz's U.S. Patent No. 11,929,896 filed before the PTAB, that if the PTAB institutes an IPR (and does not subsequently vacate institution) based on Orca's Petition, Orca will not raise or pursue (i) the specific grounds raised in IPR2025-01084, or (ii) any other grounds that could have reasonably been raised before the PTAB (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications) in the above-identified district court litigation.

Stipulation for U.S. Patent No. 11,936,693

Orca hereby stipulates, in view of the instant IPR (IPR2025-01085) against Wiz's U.S. Patent No. 11,936,693 filed before PTAB, that if the PTAB institutes an IPR (and does not subsequently vacate institution) based on Orca's Petition, Orca will not raise or pursue (i) the specific grounds raised in IPR2025-01085, or (ii) any other grounds that could have reasonably been raised before the PTAB (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications) in the above-identified district court litigation.

Stipulation for U.S. Patent No. 12,001,549

Orca hereby stipulates, in view of the instant IPR (IPR2025-01086) against Wiz's U.S. Patent No. 12,001,549 filed before the PTAB, that if the PTAB institutes an IPR (and does not subsequently vacate institution) based on Orca's Petition, Orca will not raise or pursue (i) the specific grounds raised in IPR2025-01086, or (ii) any other grounds that could have reasonably

been raised before the PTAB (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications) in the above-identified district court litigation.

Stipulation for U.S. Patent No. 12,003,529

Orca hereby stipulates, in view of the instant IPR (IPR2025-01086) against Wiz's U.S. Patent No. 12,003,529 filed before PTAB, that if the PTAB institutes an IPR (and does not subsequently vacate institution) based on Orca's Petition, Orca will not raise or pursue (i) the specific grounds raised in IPR2025-01086, or (ii) any other grounds that could have reasonably been raised before the PTAB (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications) in the above-identified district court litigation.