

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CODE200, UAB; TESO LT, UAB; METACLUSTER LT, UAB; AND  
OXYSALES, UAB,

Petitioners

v.

LUMINATI NETWORKS LTD.,

Patent Owner

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Case IPR2020-01266

Patent 10,257,319

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**DECLARATION OF THOMAS M. DUNHAM**

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

I, Thomas M. Dunham, declare as follows under penalty of perjury.

1. I am lead counsel for Patent Owner.
2. Concurrently filed with Patent Owner's Preliminary Response are the following exhibits.
3. Exhibit 2001 is a true and correct copy of Oxylabs' Motion To Stay Pending *Inter Partes* Reviews (public-redacted) in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 131.
4. Exhibit 2002 is a true and correct copy of a portion of the Joint Claim Construction and Prehearing Statement in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 105-1
5. Exhibit 2003 is a true and correct copy of Plaintiff's Markman opening brief in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 126,
6. Exhibit 2004 is a true and correct copy of the Defendants' Markman response brief in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 138,
7. Exhibit 2005 is a true and correct copy of Plaintiff's Markman reply brief in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 145

8. Exhibit 2006 is a true and correct copy of SEALED Excerpts of Defendants' Amended Invalidity Contentions served August 31, 2020 in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG.
9. Exhibit 2007 is a true and correct copy of Oxysales' Answer (public-redacted) in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG, ECF. No. 95
10. Exhibit 2008 is a true and correct copy of the October 18, 2018 response during the '319 patent prosecution history at LUM-00149133-34.
11. Exhibit 2009 is a true and correct copy of Dr. Rhyne's Markman Declaration in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG, ECF No. 126
12. Exhibit 2010 is a true and correct copy of the Sur-Reply in the Motion to Dismiss in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 47
13. Exhibit 2011 is a true and correct copy of the Order on the Motion to Dismiss in *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 85
14. Exhibit 2012 is a true and correct copy of the Declaration of V. Thomas Rhyne.

15. Exhibit 2013 is a true and correct copy of an Amended Rule 7.1 disclosure statement from *Luminati v. Teso Lt UAB et al.*, E.D. Texas, Case No. 2:19-cv-00395-JRG ECF No. 55
16. Exhibit 2014 is a true and correct copy of Code200's Rule 7.1 Disclosure statement in *Luminati v. Code200 et al.*, E.D. Texas, Case No. 2:19-cv-00396-JRG ECF No. 28.

I declare that the foregoing is true and correct.

Executed on October 26, 2020.

/s/ Thomas M. Dunham  
Thomas M. Dunham,  
Reg. No. 39,965