

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

OXYSALES, UAB,
Petitioners

v.

LUMINATI NETWORKS LTD.,
Patent Owner

Case IPR2020-01266

Patent 10,257,319

STIPULATION

Patent Owner Luminati Networks LTD (“Patent Owner”) and Petitioners Code200, UAB; Teso LT, UAB; Metacluster LT, UAB and Oxysales, UAB

(“Petitioners”) hereby stipulate as follows:

1. Petitioners have asserted four references against certain claims of U.S.

Patent No. 10,257,319 in IPR 2020-01266, namely: (i) Crowds:

Anonymity for Web Transactions, ACM Transactions on Information and System Security, Vol. 1, No. 1, Nov. 1998, at 66-92 (hereinafter

“Crowds”); (ii) United States Patent No. 6,795,848 to Border *et al.*

(hereinafter “Border”); (iii) *MorphMix – A Peer-to-Peer-based System for Anonymous Internet Access* (2004) (Doctoral Thesis) (hereinafter

“MorphMix”); and (iv) Network Working Group 2616 (hereinafter

“RFC 2616”).

2. Petitioners, excluding Code200 which is not a defendant in the case,

have asserted, among other references, Crowds, Border, MorphMix and

RFC 2616, against certain claims of U.S. Patent No. 10,257,319 in

Luminati Networks Ltd. v. Teso LT, UAB et al., 2:19-cv-00395-JRG

(E.D.Tex.) and included those references as items 1-4 in their Invalidity

Contentions.

3. Petitioners have asserted the same four references, namely, Crowds, Border, Morphmix and RFC 2616, against certain claims of U.S. Patent No. 10,484,510 in IPR 2020-01358.
4. Petitioners, excluding Code200 which is not a defendant in the case, have asserted, among other references, Crowds, Border, Morphmix and RFC 2616, against certain claims of U.S. Patent No. 10,484,510 in *Luminati Networks Ltd. v. Teso LT, UAB et al.*, 2:19-cv-00395-JRG (E.D.Tex.) and included those references as items 1-4 in their Invalidity Contentions.
5. Petitioners have asserted three references, namely, Morphmix, United States Patent No. 8,972,602 to Mithyantha (hereinafter “Mithyantha”) and RFC 2616, against certain claims of U.S. Patent No. 10,469,614 in IPR 2020-01506.
6. Petitioners, excluding Code200 which is not a defendant in the case, have asserted, among other references, Morphmix, Mithyantha and RFC 2616, against certain claims of U.S. Patent No. 10,484,614 in *Luminati Networks Ltd. v. Teso LT, UAB et al.*, 2:19-cv-00395-JRG (E.D.Tex.) and included those references in their Invalidity Contentions.

SO STIPULATED:

Date: November 19, 2020

/s/ Craig Tolliver

Craig Tolliver
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COUNSEL FOR PETITIONERS

Date: November 19, 2020

/s/ Thomas M. Dunham

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