

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

OXYSALES, UAB,

Petitioners

v.

LUMINATI NETWORKS LTD.,

Patent Owner

Case IPR2021-00122

Patent 10,484,511

STIPULATION

Patent Owner Luminati Networks LTD (“Patent Owner”) and Petitioners Teso LT, UAB; Code200, 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. 10,484,511 in IPR 2021-00122, 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 6,389,462 to Cohen (hereinafter “Cohen”); (iii) United States Patent 6,785,705 to Kocherlakota (hereinafter “Kocherlakota”); and (iv) Network Working Group 2616 (hereinafter “RFC 2616”).
2. Petitioners, excluding Teso LT which is not a defendant in the case, have asserted, among other references, Crowds, Cohen, Kocherlakota and RFC 2616, against certain claims of U.S. Patent No. 10,484,511 in *Luminati Networks Ltd. v. Teso LT, UAB et al.*, 2:19-cv-00396-JRG (E.D.Tex.) and included those references as items 1, 7, 6 and 4, respectively, in their Invalidity Contentions.
3. Petitioners have asserted three references against certain claims of U.S. Patent No. 10,637,968 in IPR 2021-00249, namely: (i) *MorphMix – A Peer-to-Peer-based System for Anonymous Internet Access* (2004)

(Doctoral Thesis) (hereinafter “MorphMix”); (ii) U.S. Patent Publication 2008/0196098 to Cottrell (hereinafter “Cottrell”); and (iii) Network Working Group 2616 (hereinafter “RFC 2616”).

4. Petitioners, excluding Teso LT which is not a defendant in the case, have asserted, among other references, MorphMix, Cottrell and RFC 2616 against certain claims of U.S. Patent No. 10,637,968 in *Luminati Networks Ltd. v. Teso LT, UAB et al.*, 2:19-cv-00396-JRG (E.D.Tex.) and included those references as items 2, 3 and 4, respectively, in their Invalidity Contentions.

SO STIPULATED:

Date: February 17, 2021

/s/ Craig Tolliver

Craig Tolliver
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COUNSEL FOR PETITIONERS

Date: February 17, 2021

/s/ Thomas M. Dunham

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