UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
NETNUT LTD.,
Petitioner
V.
BRIGHT DATA LTD.,
Patent Owner
Case IPR2021-01492
Patent No. 10,257,319

DECLARATION OF MR. THOMAS M. DUNHAM

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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 Sur-Reply, dated January 28, 2022, are the following exhibits.
 - 3. Exhibit 2011 is a true and correct copy of the Order (Dkt. 100) dated Feb. 12, 2018 in the case of *Uniloc USA, Inc. v. Ringcentral, Inc.*, No. 2-17-cv-354 (E.D. Tex.).
 - 4. Exhibit 2012 is a true and correct copy of the Motion (Dkt. 97) dated Feb. 8,2018 in the case of *Uniloc USA*, *Inc. v. Ringcentral*, *Inc.*, No. 2-17-cv-354 (E.D. Tex.).
 - Exhibit 2013 is a true and correct copy of the Order (Dkt. 99) dated Feb. 9,
 2018 in the case of *Uniloc USA, Inc. v. Ringcentral, Inc.*, No. 2-17-cv-354 (E.D. Tex.).
 - 6. Exhibit 2014 is a true and correct copy of the Joint Motion (Dkt. 79) dated Dec. 22, 2021 in the case of *Bright Data Ltd. v. NetNut Ltd.*, No. 2:21-cv-225 (E.D. Tex.).
 - 7. Exhibit 2015 is a true and correct copy of the Motion (Dkt. 80) dated Dec. 23, 2021 in the case of *Bright Data Ltd. v. NetNut Ltd.*, No. 2:21-cv-225 (E.D. Tex.).



8. Exhibit 2016 is a true and correct copy of a Letter dated Dec. 30, 2021 from Bright Data Ltd. to NetNut Ltd. regarding the scheduling of depositions in the case of *Bright Data Ltd. v. NetNut Ltd.*, No. 2:21-cv-225 (E.D. Tex.).

I declare under the laws of the United States that the foregoing is true and correct. Executed on January 28, 2022.

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

