

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

BRIGHT DATA LTD.,
Patent Owner.

Case IPR 2021-01492
Patent 10,257,319

PETITIONERS' REQUEST FOR ORAL ARGUMENT

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

Petitioners, by and through their attorneys, respectfully request oral argument. Per the communication from the Board dated April 21, 2023 (EX-3005), a single coordinated hearing between IPRs 2021-01492 and 2021-01493 (both styled *Code200, UAB v. Bright Data Ltd.*), and IPRs 2022-00915 and 2022-00916 (both styled *Major Data UAB v. Bright Data Ltd.*) is scheduled for June 9, 2023.

Petitioners respectfully request that the Board hold a remote oral argument and Petitioners request a total of 60 minutes to present their arguments. As reflected in Exhibit 3005, the Code200 and Major Data Petitioners have agreed to split the time for petitioner argument such that the two sets of petitioners will not take more total time for the petitioners' side than if there were only a single petitioner. Petitioners therefore propose to split the 60 minutes of argument time with the Major Data Petitioner.

Petitioners also request the ability to reserve a portion of their total time for presenting rebuttal arguments after Patent Owner's presentation. *See* November 2019 Consolidated Trial Practice Guide at 83.

Pursuant to 37 C.F.R § 42.70(a), and without intending to waive any issue not specifically identified, Petitioners request the ability to present arguments on all instituted grounds of alleged unpatentability, any issues raised in the parties' papers in this trial and the Board's institution decision, and any other issues the Board deems necessary for issuing a final written decision, including the following issues:

1. Grounds 1-6 of Invalidity as addressed in either the IPR 2021-01492 Petition or IPR 2021-01493 Petition, or in the Response, Reply, or Sur-Reply thereto;
2. The arguments and evidence raised in the Petition, Response, Reply, or Sur-Reply in either IPR 2021-01492 or IPR 2021-01493, including claim construction issues; and
3. Any issues raised at the Board's request.

Respectfully submitted,

CHARHON CALLAHAN ROBSON
& GARZA, PLLC

Dated: May 3, 2023

/s/ Craig Tolliver
Craig Tolliver (Reg. No. 45,975)
(Lead Attorney for Petitioners)
George "Jorde" Scott (Reg. No. 62,859)
John C. Heuton (Reg. No. 62,467)
3333 Lee Parkway
Suite 460
Dallas, TX 75219
(214) 521-6400

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that the above Petitioners' Request for Oral Argument was served on counsel for Patent Owner via e-mail, as authorized by Patent Owner, at the following e-mail addresses:

Thomas Dunham tomd@cherianllp.com
Elizabeth O'Brien elizabetho@cherianllp.com
Robert Harkins bobh@cherianllp.com

CHARHON CALLAHAN ROBSON &
GARZA, PLLC

/s/ Craig Tolliver
Craig Tolliver (Reg. No. 45,975)
(Lead Attorney for Petitioners)

Dated: May 3, 2023