UNITED STATES PATENT AND TRADEMARK (
BEFORE THE PATENT TRIAL AND APPEAL BC
Case IPR2021-01492, IPR2021-01493, IPR2022-00915

CODE200, UAB; TESO LT, UAB; METACLUSTER LT, UA
CORETECH LT, UAB
v.
BRIGHT DATA LTD.

MAJOR DATA UAB
v.
BRIGHT DATA LTD.

Petitioners' Presentati

June 9, 2023

Petitioners' Presentation

June 9, 2023

* Citations to briefing in footers are for IPR2021-01492 and
(Briefs filed in IPR2022-00915 and IPR2022-00916 are su

* Unless otherwise noted, all citations to exhibits are to IP

Outline of Argume

1. Two Primary Issues (Claim Construction)

2. Obviousness of Claim 1 Even Under Paten

3. Dependent Claims

4. Teaching Away is Not Relevant

5. Lack of Nexus for Secondary Consideration

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Two Primary Issue

Patent Owner's Proposed C
Court Claim Constructi

1	"Client Device" and "Second S
2	"At Every Moment" Change to Role-Based Construction

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