

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

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

MAJOR DATA UAB
v.
BRIGHT DATA LTD.

Petitioners' Presentation

June 9, 2023

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- * Citations to briefing in footers are for IPR2021-01492 and IPR2021-01493 (Briefs filed in IPR2022-00915 and IPR2022-00916 are submitted in support of IPR2021-01492 and IPR2021-01493)
 - * Unless otherwise noted, all citations to exhibits are to IPB2021-01492 and IPB2021-01493
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Outline of Argument

1. Two Primary Issues (Claim Construction)
2. Obviousness of Claim 1 Even Under Patent
3. Dependent Claims
4. Teaching Away is Not Relevant
5. Lack of Nexus for Secondary Consideration

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Two Primary Issues

Patent Owner's Proposed Construction Court Claim Construction

1

“Client Device” and “Second S

2

“At Every Moment” Change to
Role-Based Construction

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