

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

Mail Stop PATENT BOARD
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 Preliminary Response are the following exhibits.
3. Exhibit 2001 is a true and correct copy of the Jury Verdict (Dkt. 516) in the case of *Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.*, Case No. 2:19-cv-00395-JRG (E.D. Tex. Nov. 5, 2021).
4. Exhibit 2002 is a true and correct copy of Plaintiff Bright Data Ltd.'s Disclosure of Proposed Claim Terms for Construction, dated December 8, 2021, in the case of *Bright Data Ltd. v. NetNut Ltd.*, Case No. 2:21-cv-00225-JRG (E.D. Tex.).
5. Exhibit 2003 is a true and correct copy of the Docket Control Order (Dkt. 56) in the case of *Bright Data Ltd. v. NetNut Ltd.*, Case No. 2:21-cv-00225-JRG (E.D. Tex. Oct. 22, 2021).
6. Exhibit 2004 is a true and correct copy of the Order on Pretrial Motions and Motions *in Limine* (Dkt. 476) in the case of *Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.*, Case No. 2:19-cv-00395-JRG (E.D. Tex. Sept. 9, 2021).

7. Exhibit 2005 is a true and correct copy of the Applicant Remarks, dated October 18, 2018, regarding Application No. 15/957,945 which issued as Patent No. 10,257,319 (previously submitted in IPR2020-01266 as EX. 2008).
8. Exhibit 2006 is a true and correct copy of the Declaration of Dr. V. Thomas Rhyne Declaration (previously submitted in IPR2020-01266 as EX. 2012).
9. Exhibit 2007 is a true and correct copy of Plaintiff's Sur-reply in opposition to Defendants' Motion to Dismiss (Dkt. 47) in the case of *Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.*, Case No. 2:19-cv-00395-JRG (E.D. Tex. May 5, 2020).
10. Exhibit 2008 is a true and correct copy of the Order (Dkt. 55) in the case of *Boxcast Inc., v. Resi Media LLC, et al.*, Case No. 2:21-cv-00217-JRG (E.D. Tex. Dec. 1, 2021).
11. Exhibit 2009 is a true and correct copy of the Order (Dkt. 87) in the case of *Oyster Optics, LLC v. Infinera Corp., et al.*, Case No. 2:19-cv-00257-JRG (E.D. Tex. July 17, 2020).

I declare under the laws of the United States that the foregoing is true and correct.
Executed on December 27, 2021.

/s/ Thomas M. Dunham

Thomas M. Dunham

Reg. No. 39,965