

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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NETNUT LTD.,

Petitioner

v.

BRIGHT DATA LTD.,

Patent Owner

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Case IPR2021-01492

Patent No. 10,257,319

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**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