

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 IPR2021-01492

Patent No. 10,257,319

**PATENT OWNER'S UNOPPOSED MOTION FOR
PRO HAC VICE ADMISSION OF ROBERT M. HARKINS
UNDER 37 C.F.R. § 42.10(c)**

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Patent Trial and Appeal Board
United States Patent and Trademark Office
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EX. 2002	Plaintiff Bright Data Ltd.'s Disclosure of Proposed Claim Terms for Construction, dated December 8, 2021, in the case of <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-00225-JRG (E.D. Tex.)
EX. 2003	Docket Control Order, <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-225-JRG, Dkt. 56 (E.D. Tex. Oct. 22, 2021)
EX. 2004	Order on Pretrial Motions and Motions <i>in Limine</i> , <i>Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , No. 2:19-cv-395-JRG, Dkt. 476 (E.D. Tex. Sept. 9, 2021)
EX. 2005	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)
EX. 2006	Declaration of Dr. V. Thomas Rhyne (previously submitted in IPR2020-01266 as EX. 2012)
EX. 2007	Plaintiff's Sur-reply in opposition to Defendants' Motion to Dismiss, <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , No. 2:19-cv-395-JRG, Dkt. 47 (E.D. Tex. May 5, 2020)
EX. 2008	Order, <i>Boxcast Inc., v. Resi Media LLC, et al.</i> , No. 2:21-cv-217-JRG, Dkt. 55 (E.D. Tex. Dec. 1, 2021)
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EX. 2016	Letter, dated Dec. 30, 2021, from Bright Data Ltd. to NetNut Ltd. regarding the scheduling of depositions in the case of <i>Bright Data Ltd. v. NetNut Ltd.</i> , No. 2:21-cv-225 (E.D. Tex.)
EX. 2017	Declaration of Mr. Thomas M. Dunham
EX. 2018	Order, <i>Bright Data Ltd. v. NetNut Ltd.</i> , No. 2:21-cv-225, Dkt. 153 (E.D. Tex. May 17, 2022)
EX. 2019	Settlement Agreement between Bright Data Ltd. and NetNut Ltd. – BOARD ONLY (as of December 7, 2022)
EX. 2020	Declaration of Robert M. Harkins

I. INTRODUCTION

Patent Owner respectfully submits this Unopposed Motion for *Pro Hac Vice* Admission of Robert M. Harkins under 37 C.F.R. § 42.10(c) (“Motion”) in connection with IPR2021-01492.

This Motion is filed as authorized by the Notice (Paper 5) and in accordance with the Board’s representative Order in *Unified Patents, Inc. v. Parallel Iron, LLC*, IPR2013-00639, Paper 7 (PTAB Oct. 15, 2013). This Motion is filed no sooner than 21 days after service of the petition in this proceeding.

Patent Owner has paid the requisite fees and the Office is authorized to charge Deposit Account No. 603803 (Customer No. 144371) any other applicable fees for this Motion.

II. STATEMENT OF FACTS SHOWING THERE IS GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL *PRO HAC VICE* DURING THIS PROCEEDING

Patent Owner respectfully submits that this Motion and the accompanying Declaration of Robert M. Harkins (EX.2020) establish good cause for the Board to recognize Mr. Harkins *pro hac vice* during this proceeding.

1. Bar Membership

Mr. Harkins is a member in good standing of the State Bar of California.

EX.2020 at ¶4.

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