

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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THE DATA COMPANY TECHNOLOGIES INC.,

Petitioner

v.

BRIGHT DATA LTD.,

Patent Owner

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Case IPR2022-00135

Patent No. 10,257,319

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper 13), Patent Owner respectfully requests oral argument in this proceeding, IPR2022-00135, which is currently scheduled for March 1, 2023. *See* Paper 13 at 12.

Patent Owner respectfully requests that each party be provided with sixty (60) minutes of argument time. Patent Owner respectfully requests that Patent Owner be provided the opportunity to present a brief sur-rebuttal within the allotted argument time.

Without intending to waive any issues not specifically identified, Patent Owner wishes to present arguments on the following issues:

1. Petitioner has not met its burden of proof that the challenged claims are unpatentable;
2. Any of the preliminary findings in the Board's Institution Decision (Paper 12);
3. Any of the arguments raised in the parties' papers;
4. Any issues specified in Petitioner's Request for Oral Argument (Paper 33);
5. Rebuttal of any issues properly raised by Petitioner in this proceeding;
6. Any procedural or evidentiary issues in this proceeding; and
7. Any other issues on which the Board seeks information or clarification.

Patent Owner respectfully requests that the oral argument be held remotely. Patent Owner respectfully requests that the Board provide a video conferencing platform and a public telephone line for the oral argument. Patent Owner respectfully requests the opportunity to display demonstratives and exhibits during oral argument.

Respectfully submitted,

Date: January 18, 2023

By: /s/ Thomas M. Dunham  
Thomas M. Dunham  
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ATTORNEY FOR PATENT OWNER,  
BRIGHT DATA LTD.

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies this paper was served on the undersigned date via email, as authorized by Petitioner, at the following email addresses:

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Respectfully submitted,

Date: January 18, 2023

By: /s/ Thomas M. Dunham

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