

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE DATA COMPANY TECHNOLOGIES INC.,
Petitioner,

v.

BRIGHT DATA LTD.,
Patent Owner.

Case No. IPR2022-00135
Patent No. 10,257,319

PETITIONER'S SECOND UPDATED MANDATORY NOTICES

Petitioner hereby makes the following updates to its Mandatory Notices.

I. REAL PARTY-IN-INTEREST

[No Change.]

Petitioner is the Real Party-in-Interest. Without conceding that the following parties are in fact RPIs, Petitioner also identifies: Avantis Team Technologies Ltd. and Cytronix Ltd.

II. RELATED MATTERS

A. United States Patent & Trademark Office

1. Ancestors and Descendants of the '319 Patent

U.S. Patent No. 10,257,319 (“the '319 patent”) is a continuation of U.S. Patent No. 10,069,936, which is a division of U.S. Patent No. 8,560,604, which claims priority to U.S. Provisional Application No. 61/249,624.

The following claim the benefit of the filing date the '319 patent:

- U.S. Patent Nos. 10,491,712; 11,044,344; 10,484,510; 11,044,342;
- U.S. Patent Application Nos. 17/332,023; 17/332,077

Reexamination No. 90/014,875 (“the '875 Reexam”) is a reexamination of the '319 patent. On April 7, 2022, the Board entered an order staying the '875 Reexam pending the termination or completion of IPR2021-01492.

2. Reexaminations of Related Patents With the Same Specification

The following Ex Parte Reexaminations involve related patents which also claim priority to U.S. Provisional Application No. 61/249,624 and have the same specification as the '319 patent:

Reexamination	U.S. Patent	Status
90/014,624	10,484,511	Pending (Response after Final Action received 1/26/2023)
90/014,652	10,637,968	Pending (Advisory Action after Final Rejection mailed 1/26/2023)
90/014,816	10,637,968	Pending (Advisory Action after Final Rejection mailed 1/26/2023)
90/014,827	10,484,511	Pending (Response after Final Action received 1/26/2023)
90/014,876	10,484,510	Stayed pending IPR2021-01493
90/014,920	11,050,852	Pending (Response after Final Action received 1/10/2023)
90/014,940	11,044,346	Pending (Final Rejection mailed 2/2/2023)
90/019,041	10,491,713	Terminated

B. United States Patent Trial and Appeal Board

1. IPRs Involving the '319 Patent

The following inter partes review proceedings involve the '319 patent:

- *Code200, UAB et al. v. Luminati Networks Ltd. f/k/a Hola Networks Ltd.*, Case No. IPR2020-01266¹ (terminated).
- *NetNut Ltd. v. Bright Data Ltd.*, Case No. IPR2021-01492 (pending)
- *Code200, UAB et al. v. Bright Data Ltd.*, Case Nos. IPR2022-00861 (joined with IPR2021-01492), IPR2022-01109 (terminated), and IPR2023-00038 (terminated);
- *Major Data UAB v. Bright Data Ltd.*, Case No. IPR2022-00915 (pending);

2. IPRs Involving Related Patents With the Same Specification

The following inter partes review proceedings involve related patents which also claim priority to U.S. Provisional Application No. 61/249,624 and have the same specification as the '319 patent:

IPR	Petitioner	U.S. Patent	Status
IPR2020-01358	<i>Code200, UAB et al.</i>	10,484,510	terminated
IPR2021-01493	<i>NetNut Ltd.</i>	10,484,510	pending
IPR2022-00138	<i>The Data Company Technologies Inc.</i>	10,484,510	pending
IPR2022-00862	<i>Code200, UAB et al.</i>	10,484,510	joined with IPR2021-01493
IPR2022-01110	<i>Code200, UAB et al.</i>	10,484,510	terminated
IPR2023-00039	<i>Code200, UAB et al.</i>	10,484,510	terminated

¹ Luminati Networks Ltd. is now Bright Data Ltd. (“Patent Owner” or “PO”).

IPR	Petitioner	U.S. Patent	Status
IPR2022-00916	<i>Major Data UAB</i>	10,484,510	pending
IPR2022-00103	<i>Code200, UAB et al.</i>	11,044,342	pending
IPR2022-00353	<i>Code200, UAB et al.</i>	11,044,344	pending
IPR2022-00687	<i>Metacluster Lt, UAB et al.</i>	11,190,622	pending
IPR2022-00936	<i>Metacluster Lt, UAB et al.</i>	11,206,317	terminated

C. U.S. District Court for the Eastern District of Texas

The '319 patent is or has been at issue in the following cases, collectively referred to herein as “the EDTX cases”:

- *Bright Data Ltd. v. NetNut Ltd.*, Civil Action No. 2:21-cv-00225-JRG (“the 225 case”);
- *Bright Data Ltd. v. Tefincom SA d/b/a NordVPN*, Civil Action No. 2:19-cv-00414-JRG (“the 414 case”);
- *Luminati Networks Ltd. v. BI Science (2009) Ltd.*, Civil Action No. 2:19-cv-397-JRG (“the 397 case”)²;
- *Bright Data Ltd. v. Teso LT, UAB a/k/a UAB Teso LT et al.*, Civil Action No. 2:19-cv-00395-JRG (“the 395 case”);
- *Bright Data Ltd. v. Ninja-Tech, SIA*, Civil Action No. 2:21-cv-00434-JRG-RSP.

² The 397 case was dismissed before Luminati Networks Ltd. changed its name to Bright Data Ltd.

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