

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 IPR2022-00135

Patent No. 10,257,319

DECLARATION OF DR. TIM A. WILLIAMS

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

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I. INTRODUCTION

1. I, Dr. Tim A. Williams, declare as follows:
2. My full name is Tim Arthur Williams.
3. I have been retained as an independent expert in this matter by counsel for Patent Owner Bright Data Ltd. (“Bright Data”). I have been asked to provide my opinions on certain references in the above-identified *inter partes* review (“IPR”) proceeding, IPR2022-00135, involving U.S. Patent No. 10,257,319 (“the ’319 Patent”).
 4. In IPR2022-00138 (the related proceeding) of U.S. Patent No. 10,484,510 (“the ‘510 Patent”): I reviewed the Petition (Paper 2) and the exhibits submitted with the Petition (EXS. 1001-1079); I reviewed the Patent Owner Preliminary Response (“POPR,” Paper 6) and the exhibits submitted with the POPR (EXS. 2001-2009); I reviewed Petitioner’s Reply to the POPR (Paper 8) and Patent Owner’s Sur-reply to the POPR (Paper 9); and I reviewed the Institution Decision (Paper 12) dated May 11, 2022.
 5. In IPR2022-00135 (this proceeding): I reviewed the Petition (Paper 2) and the exhibits submitted with the Petition (EXS. 1001-1078); I reviewed the Patent Owner Preliminary Response (“POPR”, Paper 7) and the exhibits submitted with the POPR (EXS. 2001-2009); I reviewed Petitioner’s Reply to the POPR

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