

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

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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 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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