

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

**PATENT OWNER'S MOTION TO SEAL AND
TO ENTER THE JOINT PROTECTIVE ORDER**

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United States Patent and Trademark Office
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EX. 2001	Declaration of Dr. V. Thomas Rhyne
EX. 2002	U.S. Patent No. 10,469,614
EX. 2003	U.S. Patent No. 10,491,712
EX. 2004	U.S. Patent No. 10,491,713
EX. 2005	U.S. Patent No. 11,050,852
EX. 2006	U.S. Patent No. 8,972,602 (“Mithyantha”)
EX. 2007	Order (Dkt. 303) in the case of <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , Case No. 2:19-cv-00395 (E.D. Tex. Feb. 12, 2021)
EX. 2008	Patent Owner’s Sur-Reply (Dkt. 47) in the case of <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , Case No. 2:19-cv-00395 (E.D. Tex. May 5, 2020)
EX. 2009	Patent Owner’s Reply (Dkt. 145) in the case of <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , Case No. 2:19-cv-00395 (E.D. Tex. Oct. 20, 2020)
EX. 2010	Deposition Transcript of Dave Levin, dated July 22, 2022
EX. 2011	U.S. Patent No. 8,560,604
EX. 2012	U.S. Patent No. 10,069,936
EX. 2013	Claim Construction Order (Dkt. 146) in the case of <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-00225 (E.D. Tex. May 10, 2022)

EX. 2014	Bright Data, “Residential Proxy Network”, accessed at https://brightdata.com/proxy-types/residential-proxies on July 29, 2022
EX. 2015	Definition “Consumer”, Cambridge English Dictionary; accessed at https://dictionary.cambridge.org/us/dictionary/english/consumer on June 10, 2022
EX. 2016	Definition “Consumer”, Collins English Dictionary; accessed at https://www.collinsdictionary.com/us/dictionary/english/consumer on June 10, 2022
EX. 2017	Network Fundamentals Study Guide, published February 17, 2015; accessed at https://www.webopedia.com/reference/network-fundamentals-studyguide/#topologies on June 14, 2022
EX. 2018	Bright Data, Network Diagram – HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY
EX. 2019	EMK Capital, “EMK acquires Luminati”, published August 10, 2017; accessed at https://www.emkcapital.com/emk-acquires-luminati-worlds-largest-ip-proxy-network-brings-transparency-internet/ on July 29, 2022
EX. 2020	Appendix to Declaration of Dr. Tim A. Williams - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE
EX. 2021	Source Code File 1 of 4 - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE
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EX. 2024	Source Code File 4 of 4 - HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE

EX. 2025	Frost & Sullivan Report, “Global IP Proxy Networks Market,” published July 2019
EX. 2026	Excerpts from Trial Transcript, Day 1 in the case of <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , Case No. 2:19-cv-00395 (E.D. Tex. Nov. 1, 2021)
EX. 2027	Excerpts from Trial Transcript, Day 3 in the case of <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , Case No. 2:19-cv-00395 (E.D. Tex. Nov. 3, 2021)
EX. 2028	Jury Verdict (Dkt. 516) in the case of <i>Bright Data Ltd. f/k/a Luminati Networks Ltd. v. Teso LT, UAB a/k/a UAB Teso LT, et al.</i> , Case No. 2:19-cv-00395 (E.D. Tex. Nov. 5, 2021)
EX. 2029	Bright Data, “Proxy Services”, accessed at https://brightdata.com/proxy-types on July 29, 2022
EX. 2030	Oxylabs, “Legal Timeline Between Oxylabs and Luminati (now Bright Data)”, accessed at https://oxylabs.io/legal-timeline on August 4, 2022
EX. 2031	Earthweb, “16 Best Residential Proxies to Buy in 2022”, last updated May 19, 2022; accessed at https://earthweb.com/residential-proxies/ on May 19, 2022
EX. 2032	SmartProxy, “What is the difference between residential and datacenter proxies?”, published June 3, 2021; accessed at https://smartproxy.com/blog/what-is-the-difference-between-proxy-servers-and-data-centers on May 19, 2022
EX. 2033	Microleaves, “Backconnect Residential Proxies”, accessed at https://web.archive.org/web/20170913105635/https://microleaves.com/services/backconnect-proxies?promotion=dNPa on May 20, 2022

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