

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Bright Data Ltd.,

Plaintiff,

v.

**Teso LT, UAB, Oxysales, UAB, and
Metacluster LT, UAB,**

Defendants.

**Civil Action No.
2:19-cv-00395-JRG**

DEFENDANTS' DISCLOSURE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282, Defendants Teso LT, UAB, Oxysales, UAB, and Metacluster LT, UAB (collectively, "Oxylabs" or "Defendants") provide notice to Plaintiff Bright Data Ltd. ("Bright Data") of the following: (i) patents and publications relied upon for anticipation of the patents-in-suit or as showing the state of the art; and (ii) persons who may be relied upon as the prior inventor, as having prior knowledge of, or as having previously used or offered for sale the invention of the patents-in-suit.

I. PATENTS AND PUBLISHED PATENT APPLICATIONS

Filing Date	Country	Issue Date or Publication Date	Patent or Publication No.	Patentee
November 8, 2000	US	September 21, 2004	6,795,848	Border et al.
June 15, 2012	US	March 3, 2015	8,972,602	Mithyantha
April 9, 2008	US	December 29, 2010	7,860,988	Aoki et al.
July 14, 2010	US	April 14, 2011	2011/0087733	Shribman et al.

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August 30, 2001	US	August 29, 2006	7,099,927	Cudd et al.
February 8, 2013	US	September 1, 2015	9,122,554	Callaghan et al.
September 6, 2009	US	March 17, 2011	2011/0066924	Dorso et al.
August 12, 2005	US	June 5, 2008	2008/0134258	Goose et al.
August 28, 2013	US	November 5, 2019	10,469,614	Shribman et al.
October 8, 2009	US	April 9, 2019	10,257,319	Shribman et al.
October 8, 2009	US	November 19, 2019	10,484,510	Shribman et al.

II. PRINTED PUBLICATIONS

Date	Title	Page Numbers
November 1998	Crowds: Anonymity for Web Transactions	<i>Passim</i>
January 23, 2004	MorphMix - A Peer-to-Peer-based System for Anonymous Internet Access	<i>Passim</i>
March 2004	Democratizing content publication with Coral. In Proc. 1st Symposium on Networked Systems Design and Implementation (NSDI 04), San Francisco, CA.	<i>Passim</i>
March 13, 2009	Experiences with Coral CDN: A five-year operational view. Microsoft Research.	<i>Passim</i>
2001	Peer-to-Peer: Harnessing the Power of Disruptive Technology, chapters Accountability and Free Haven. O'Reilly.	<i>Passim</i>
June 1999	Request for Comments (RFC) 2616 (HTTP), published by HTTP Working Group of the Internet Engineering Task Force (IETF)	<i>Passim</i>
January 1980	RFC 760 (Internet Protocol)	<i>Passim</i>

December 1998	RFC 2460 (Internet Protocol Version 6 (IPv6))	<i>Passim</i>
September 1981	RFC 793 (Transmission Control Protocol (TCP))	<i>Passim</i>
July 1992	RFC 1349 (Internet Protocol Suite)	<i>Passim</i>
September 2000	RFC 2914 (Congestion Control Principles)	<i>Passim</i>
March 2005	RFC 4026 (Provider Provisioned Virtual Private Network (VPN))	<i>Passim</i>
March 1999	RFC 2547 (BGP/MPLS VPNs)	<i>Passim</i>
January 1991	RFC 1180 (TCP/IP Tutorial)	<i>Passim</i>
October 1989	RFC 1122 (Requirements for Internet Hosts – Communication Layers)	<i>Passim</i>
October 2013	W3 Geolocation API Specification	<i>Passim</i>
December 2008	W3 Geolocation API Specification	<i>Passim</i>
1998	Web Proxy Servers, Ari Luotonen	<i>Passim</i>
2006	William R. Stanek, <i>Introducing Microsoft Windows Vista</i> 81 (2006)	<i>Passim</i>
2011	Yong Wang, et. al., <i>Towards Street-Level Client-Independent IP Geolocation</i> (2011) ¹	<i>Passim</i>
1987	RFC 1034 (Domain Names – Concepts and Facilities)	<i>Passim</i>
1987	RFC 1035 (Domain Names – Implementation and Specification)	<i>Passim</i>
September 1981	RFC 791 (Internet Protocol Version 4 (IPv4))	<i>Passim</i>
October 1985	RFC 959 (File Transfer Protocol (FTP))	<i>Passim</i>
August 1982	RFC 821 (Simple Mail Transfer Protocol)	<i>Passim</i>

¹ https://www.usenix.org/legacy/events/nsdi11/tech/full_papers/Wang_Yong.pdf

October 1984	RFC 918 (Post Office Protocol version 1 (POP1))	<i>Passim</i>
February 1985	RFC 937 (Post Office Protocol version 2 (POP2))	<i>Passim</i>
May 1996	RFC 1939 (Post Office Protocol version 3 (POP3))	<i>Passim</i>
May 1996	RFC 1945 (Hypertext Transfer Protocol version 1.0 (HTTP/1.0))	<i>Passim</i>
February 1997	RFC 2109 (HTTP State Management Mechanism)	<i>Passim</i>

III. PERSONS RELIED UPON

Name	Address
Michael Freedman	Department of Computer Science at Princeton University 35 Olden Street Princeton, NJ 08540-5233
Kevin Almeroth	University of California Santa Barbara, CA 93106-5110
Scott Delman	1601 Broadway, 10th Floor New York, NY 10019-7434
Andreas Berz	Hallwylstrasse 15, CH-3003 Bern, Switzerland
Marc Rennhard	Technikumstrasse 9, 8401 Winterthur, Switzerland
Bernhard Plattner	Gloriastrasse 35, 8092 Zürich, Switzerland
Inventors/Authors of Prior Art References Cited Herein	As listed in references, or unknown

The foregoing disclosure is made in an abundance of caution in view of 35 U.S.C. § 282(c). Bright Data has been previously put on notice of the patents, patent publications, publications, and individuals mentioned above, at least through Oxylabs' Initial Invalidity Contentions and Accompanying Document Production and Amended Invalidity Contentions, as well as through the expert reports of Dr. Michael Freedman and Dr. Kevin Almeroth, including all appendices and exhibits

thereto, each of which were disclosed on or before the deadlines set forth by the Docket Control Order for this case. The disclosures set forth in Oxylabs' Initial Invalidity Contentions and Accompanying Document Production and Amended Invalidity Contentions, as well as through the expert reports of Dr. Michael Freedman and Dr. Kevin Almeroth are hereby incorporated by reference as if set forth fully herein.

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