UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CODE200, UAB; TESO LT, UAB; METACLUSTER LT, UAB; OXYSALES, UAB; AND CORETECH LT, UAB,

Petitioners

v.

BRIGHT DATA LTD.,

Patent Owner

Case IPR2022-00861

Patent No. 10,257,319

CORRECTED PATENT OWNER PRELIMINARY RESPONSE[1]

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

[1] As authorized by the Board via email on June 21, 2022.

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PATENT OWNER'S LIST OF EXHIBITS	
EX.~~2001~~2033	Institution Decision regarding Patent No. 10,257,319, *NetNut Ltd. v. Bright Data Ltd.*, IPR2021-01492, Paper 12 (PTAB March 21, 2022)
EX.~~2002~~2034	Institution Decision regarding Patent No. 10,484,510, *NetNut Ltd. v. Bright Data Ltd.*, IPR2021-01493, Paper 11 (PTAB March 21, 2022)
EX.~~2003~~2035	Claim Construction Order, *Bright Data Ltd. v. NetNut Ltd,* No. 2:21-cv-225, Dkt. 146 (E.D. Tex. May 10, 2022)
EX.~~2004~~2036	Definition "Consumer", Cambridge English Dictionary; accessed at https://dictionary.cambridge.org/us/dictionary/english/consumer on June 10, 2022
EX.~~2005~~2037	Definition "Consumer", Collins English Dictionary; accessed at https://www.collinsdictionary.com/us/dictionary/english/consumer on June 10, 2022
EX.~~2006~~2038	Prosecution History of Patent No. 10,069,936
EX.~~2007~~2039	Network Fundamentals Study Guide, published February 17, 2015; accessed at https://www.webopedia.com/reference/network-fundamentals-studyguide/#topologies on June 14, 2022
EX.~~2008~~2040	Patent No. 10,069,936
EX.~~2009~~2041	*Alice* Order, *Bright Data Ltd. v. Teso LT, UAB, et al.,* No. 2:19-cv-395, Dkt. 303 (E.D. Tex. Feb. 12, 2021)
EX.~~2010~~2042	Motion for Summary Judgment, *Bright Data Ltd. v. Teso LT, UAB, et al.,* No. 2:19-cv-395, Dkt. 282 (E.D. Tex. Feb. 8, 2021) (redacted version of Dkt. 277)

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EX.~~2011~~2043	Order, *Bright Data Ltd. v. Teso LT, UAB, et al.,* No. 2:19-cv-395, Dkt. 476 (E.D. Tex. Sept. 9, 2021)
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EX.~~2013~~2045	Website, Company information regarding "Major Data, UAB"; accessed at https://rekvizitai.vz.lt/en/company/major_data/ on June 16, 2022
EX.~~2014~~2046	Website, "The Story of Tesonet" published on October 30, 2017; accessed at https://tesonet.com/culture/the-story-of-tesonet/ on June 16, 2022
EX.~~2015~~2047	LinkedIn Profile, "Tom Okman"; accessed at https://www.linkedin.com/in/tokmanas/ on June 16, 2022
EX.~~2016~~2048	Wikipedia Article, "Tom Okman"; accessed at https://en.wikipedia.org/wiki/Tom_Okman on June 16, 2022
EX.~~2017~~2049	Website, "Who Owns NordVPN? Can You Really Trust This VPN?"; accessed at https://www.technadu.com/who-owns-nordvpn/295187/ on June 16, 2022
EX.~~2018~~2050	Order, *Bright Data Ltd. v. Tefincom S.A.,* No. 2:19-cv-414, Dkt. 176 (E.D. Tex. Nov. 17, 2021)
EX.~~2019~~2051	Docket Control Order, *Bright Data Ltd. v. Tefincom S.A.,* No. 2:19-cv-414, Dkt. 31 (E.D. Tex. Feb. 9, 2021)
EX.~~2020~~2052	Select Portions of Trial Transcript, Day 3 in the case of *Bright Data Ltd. v. Teso LT, UAB, et al.,* No. 2:19-cv-395 (E.D. Tex. Nov. 3, 2021)
EX.~~2021~~2053	Select Portions of Trial Transcript, Day 4 in the case of *Bright Data Ltd. v. Teso LT, UAB, et al.,* No. 2:19-cv-395 (E.D. Tex. Nov. 4, 2021)

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