

U.S. Pat. No. 10,484,510
Inter Partes Review
Petitioner's Motion for Joinder

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.

Inter Partes Review No. IPR2022-00862
Patent No. 10,484,510

**MOTION FOR JOINDER TO *INTER PARTES*
REVIEW IPR2021-01493**

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I. STATEMENT OF PRECISE RELIEF REQUESTED

Petitioners Code200, UAB; Teso LT, UAB; Metacluster LT, UAB; Oxysales, UAB; and coretech LT UAB (collectively, “Petitioners”) move for joinder of their contemporaneously filed Petition for *Inter Partes* Review IPR2022-00861 (the “Petition”) of claims 1, 2, 6-11, 13, and 15-24 of U.S. Patent No. 10,484,510 (the “’510 patent”) with a pending IPR styled *NetNut Ltd. v. Bright Data Ltd.*, IPR2021-01493 (the “NetNut IPR”), which the Board instituted on March 21, 2022.

In addition to the present Petition, third parties have previously sought review of the validity of certain claims of the ’510 patent in federal court, the Central Reexam Unit, and the PTAB. As discussed below, only the NetNut IPR has been instituted and is not currently stayed.

The NetNut IPR concerns the same patent and the same claims as the present Petition. The present Petition and supporting expert declaration are substantively identical to the petition and expert declaration submitted in the NetNut IPR. In sum, Petitioners here assert that the same claims are anticipated and/or obvious over the same prior art based on the same substantive arguments that are supported by the same expert as in the NetNut IPR.

Petitioners agree to take an “understudy” role if joined. Joinder will not cause any delay in the resolution of the NetNut IPR. Joinder, therefore, is appropriate because it will promote the efficient and consistent resolution of the same patentability issues of the

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