

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

BRIGHT DATA LTD.,

Patent Owner

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Case IPR2022-01109

Patent No. 10,257,319

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**PATENT OWNER PRELIMINARY RESPONSE**

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

**TABLE OF CONTENTS**

I. INTRODUCTION .....1

II. BACKGROUND TO THIS PROCEEDING .....3

III. PETITIONERS HAVE PRESENTED FIVE CHALLENGES AGAINST THE ‘319 PATENT .....4

    A. THE *GENERAL PLASTIC* FACTORS .....5

        1. GENERAL PLASTIC FACTOR 1 FAVORS DENIAL .....6

        2. GENERAL PLASTIC FACTOR 2 FAVORS DENIAL .....7

        3. GENERAL PLASTIC FACTOR 3 IS NEUTRAL.....8

        4. GENERAL PLASTIC FACTOR 4 IS NEUTRAL.....9

        5. GENERAL PLASTIC FACTOR 5 IS NEUTRAL.....9

        6. GENERAL PLASTIC FACTOR 6 FAVORS DENIAL .....9

        7. GENERAL PLASTIC FACTOR 7 IS NEUTRAL.....10

        8. BALANCING THE GENERAL PLASTIC FACTORS .....10

    B. THE *FINTIV* FACTORS .....12

        1. FINTIV FACTOR 1 IS NEUTRAL.....13

        2. FINTIV FACTOR 2 FAVORS DENIAL .....13

        3. FINTIV FACTOR 3 FAVORS DENIAL .....13

        4. FINTIV FACTOR 4 FAVORS DENIAL .....14

        5. FINTIV FACTOR 5 FAVORS DENIAL .....16

        6. FINTIV FACTOR 6 FAVORS DENIAL .....17

        7. BALANCING THE FINTIV FACTORS .....17

IV. OVERVIEW OF THE ‘319 PATENT .....18

    A. PROBLEMS IDENTIFIED IN THE SPECIFICATION .....18

    B. DETAILED DESCRIPTION .....19

    C. PETITIONERS MISCHARACTERIZE THE ‘319 PATENT .....23

V. CLAIM CONSTRUCTION .....24

    A. “CLIENT DEVICE” .....25

1. FIGURES IN THE SPECIFICATION.....	33
a. FIGURE 1 .....	34
b. FIGURE 3 .....	35
c. COMPARISON OF FIGURES 1 AND 3 .....	36
2. PROSECUTION HISTORIES .....	37
a. PROSECUTION HISTORY OF THE PARENT PATENT NO. 10,069,936 .....	38
b. PROSECUTION HISTORY OF THE ‘319 PATENT .....	40
c. PROSECUTION HISTORY OF THE CHILD ‘510 PATENT .....	42
B. “SECOND SERVER” .....	42
VI. OVERVIEW OF PLAMONDON .....	47
VII. GROUND 1 FAILS .....	49
A. NO DISCLOSURE OF CLAIM 1, STEP 1 UNDER ROLE-BASED CONSTRUCTIONS .....	49
B. NO DISCLOSURE OF CLAIM 1, STEP 4 UNDER ROLE-BASED CONSTRUCTIONS .....	50
C. NO DISCLOSURE OF ARCHITECTURE OF CLAIM 1 UNDER PATENT OWNER’S PROPOSED CONSTRUCTIONS .....	52
1. CLIENT 102 .....	54
2. APPLIANCE 200 .....	58
3. PETITIONERS’ ARGUMENTS ARE HINDSIGHT BIASED .....	59
D. NO DISCLOSURE OF DEPENDENT CLAIMS .....	60
1. CLAIM 14 .....	60
2. CLAIM 24 .....	63
VIII. GROUNDS 2-7 FAIL .....	65
A. GROUND 6 (PLAMONDON + PRICE) .....	66
B. GROUND 7 (PLAMONDON + KOZAT) .....	68
IX. CONCLUSION.....	69

<b><u>PATENT OWNER'S LIST OF EXHIBITS</u></b>	
EX. 2001	Unopposed Motion to Extend Deadline to Answer or Otherwise Respond to Complaint and Set Briefing Schedule on Motion to Dismiss, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 13 (E.D. Tex. Mar. 5, 2020)
EX. 2002	Defendants' Disclosure Pursuant to 35 U.S.C. § 282, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 450 (E.D. Tex. July 16, 2021)
EX. 2003	Order, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 543 (E.D. Tex. Mar. 5, 2020)
EX. 2004	Order, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 567 (E.D. Tex. Jan. 7, 2022)
EX. 2005	Minute Entry, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 573 (E.D. Tex. Feb. 4, 2022)
EX. 2006	Order, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 575 (E.D. Tex. Feb. 10, 2022)
EX. 2007	Order, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , Case No. 2:19-cv-00395, Dkt. 580 (E.D. Tex. Mar. 16, 2022)
Ex. 2008	U.S. Patent No. 7,865,585 (“Samuels”)
EX. 2009	U.S. Patent No. 8,972,602 (“Mithyantha”)
EX. 2010	U.S. Patent No. 10,469,614
EX. 2011	Motion for Summary Judgment, <i>Bright Data Ltd. v. Teso LT, UAB, et al.</i> , No. 2:19-cv-395, Dkt. 282 (E.D. Tex. Feb. 8, 2021)(redacted version of Dkt. 277)
EX. 2012	Declaration of Dr. Tim A. Williams , Public Version, previously filed in IPR2022-00135 as Exhibit 2044 on August 24, 2022

EX. 2013	Claim Construction Order, <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-00225, Dkt. 146 (E.D. Tex. May 10, 2022), previously filed in IPR2022-00135 as Exhibit 2013 on August 24, 2022
EX. 2014	U.S. Patent No. 10,491,713, previously filed in IPR2022-00135 as Exhibit 2004 on March 8, 2022
EX. 2015	Definition “Consumer”, Cambridge English Dictionary; accessed at <a href="https://dictionary.cambridge.org/us/dictionary/english/consumer">https://dictionary.cambridge.org/us/dictionary/english/consumer</a> on June 10, 2022, previously filed in IPR2022-00135 as Exhibit 2015 on August 24, 2022
EX. 2016	Definition “Consumer”, Collins English Dictionary; accessed at <a href="https://www.collinsdictionary.com/us/dictionary/english/consumer">https://www.collinsdictionary.com/us/dictionary/english/consumer</a> on June 10, 2022, previously filed in IPR2022-00135 as Exhibit 2016 on August 24, 2022
EX. 2017	Network Fundamentals Study Guide, published February 17, 2015; accessed at <a href="https://www.webopedia.com/reference/network-fundamentals-studyguide/#topologies">https://www.webopedia.com/reference/network-fundamentals-studyguide/#topologies</a> on June 14, 2022, previously filed in IPR2022-00135 as Exhibit 2017 on August 24, 2022
EX. 2018	Order, <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, Dkt. 303 (E.D. Tex. Feb. 12, 2021), previously filed in IPR2022-00135 as Exhibit 2007 on March 8, 2022
EX. 2019	Patent Owner’s Sur-Reply, <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, Dkt. 47 (E.D. Tex. May 5, 2020), previously filed in IPR2022-00135 as Exhibit 2008 on March 8, 2022
EX. 2020	Patent Owner’s Reply, <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, Dkt. 145 (E.D. Tex. Oct. 20, 2020), previously filed in IPR2022-00135 as Exhibit 2009 on March 8, 2022

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