

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 No. IPR2022-01109
Patent No. 10,257,319

**PETITIONERS' AUTHORIZED REPLY TO
PATENT OWNER'S PRELIMINARY RESPONSE**

LISTING OF EXHIBITS

| Exhibit | Description |
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| 1001 | U.S. Patent No. 10,257,319 |
| 1002 | Prosecution History of U.S. Patent No. 10,257,319 |
| 1003 | Declaration of Prof. Dave Levin (“Levin”) |
| 1004 | Curriculum Vitae of Prof. Dave Levin |
| 1005 | Patent Owner’s Opening Claim Construction Brief, <i>Luminati Networks Ltd. v. Teso LT et al.</i> , 2:19-cv-00395-JRG, D.I. 126 (E.D. Tex. Sept. 29, 2020) |
| 1006 | Claim Construction Opinion and Order, <i>Luminati Networks Ltd. v. Teso LT et al.</i> , 2:19-cv-00395-JRG, D.I. 191 (E.D. Tex. Dec. 7, 2020) |
| 1007 | Patent Owner’s Opposition to Motion to Dismiss, <i>Luminati Networks Ltd. v. Teso LT et al.</i> , 2:19-cv-00395-JRG, D.I. 28 (E.D. Tex. Apr. 7, 2020) |
| 1008 | Corrected Patent Owner’s Preliminary Response, <i>Code200, UAB, et al. v. Luminati Networks Ltd.</i> , IPR2020-01266, Paper 16 (PTAB Dec. 9, 2020) |
| 1009 | Supplemental Claim Construction Order, <i>Bright Data Ltd. v. Teso LT et al.</i> , 2:19-cv-00395-JRG, D.I. 453 (E.D. Tex. Aug. 6, 2021) |
| 1010 | U.S. Patent Application Publication No. 2008/0228938 (“Plamondon”) |
| 1011 | Declaration of Sandy Ginoza for IETF |
| 1012 | Ginoza Decl. Exh. 1, RFC 793: Transmission Control Protocol - DARPA Internet Program Protocol Specification, Information Sciences Institute (September 1981) (“RFC 793”) |
| 1013 | Ginoza Decl. Exh. 2, RFC 1001: Protocol Standard for a NetBIOS Service on a TCP/UDP Transport: Concepts and Methods, NetBIOS Working Group (March 1987) (“RFC 1001”) |
| 1014 | Ginoza Decl. Exh. 3, RFC 1122: Requirements for Internet Hosts -- Communication Layers, Internet Engineering Task Force (October 1989) (“RFC 1122”) |

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| 1015 | Ginoza Decl. Exh. 4, RFC 1630: Universal Resource Identifiers in WWW - A Unifying Syntax for the Expression of Names and Addresses of Objects on the Network as used in the World-Wide Web, Network Working Group (June 1994) (“RFC 1630”) |
| 1016 | Ginoza Decl. Exh. 5, RFC 1738: Uniform Resource Locators (URL), Network Working Group (December 1994) (“RFC 1738”) |
| 1017 | Ginoza Decl. Exh. 6, RFC 2187: Application of Internet Cache Protocol (ICP), version 2, National Laboratory for Applied Network Research/UCSD (September 1997) (“RFC 2187”) |
| 1018 | Ginoza Decl. Exh. 7, RFC 2616: Hypertext Transfer Protocol -- HTTP/1.1, The Internet Society (June 1999) (“RFC 2616”) |
| 1019 | Ginoza Decl. Exh. 8, RFC 2960: Stream Control Transmission Protocol, The Internet Society (October 2000) (“RFC 2960”) |
| 1020 | Ginoza Decl. Exh. 9, RFC 6520: Transport Layer Security (TLS) and Datagram Transport Layer Security (DTLS) Heartbeat Extension, Internet Engineering Task Force (February 2012) (“RFC 6520”) |
| 1021 | Declaration of Gordon MacPherson for IEEE |
| 1022 | MacPherson Decl. Exh. A, IEEE 802.11-2007 - IEEE Standard for Information Technology - Telecommunications and Information Exchange Between Systems – Local and Metropolitan Area Networks - Specific Requirements - Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, June 12, 2007 (“IEEE 802.11-2007”) |
| 1023 | U.S. Patent Application Publication No. 2006/0026304 (“Price”) |
| 1024 | U.S. Patent Application Publication No. 2009/0055471 (“Kozat”) |
| 1025 | U.S. Patent No. 10,484,510 |
| 1026 | Pages from W. R. Stevens, <i>TCP/IP Illustrated, Volume 1: The Protocols</i> . Canada: Addison-Wesley, 1994, chs. 1 & 18, bibliography (“Stevens”) |
| 1027 | Prosecution History of U.S. Patent No. 10,491,712 |
| 1028 | U.S. Patent Application Publication No. 2008/0072178 (“Budzisch”) |
| 1029 | U.S. Patent Application Publication No. 2002/0178217 (“Nguyen”) |

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| 1030 | U.S. Patent Publication No. 2005/0125412 (“Glover”) |
| 1031 | U.S. Patent Application Publication No. 2007/0177513 (“Kuokkanen”) |
| 1032 | U.S. Patent No. 7,761,500 (“Eckert”) |
| 1033 | Pages from L.L. Peterson, B.S. Davie, <i>Computer Networks: A Systems Approach</i> , 4th ed. San Francisco, CA: Elsevier, 2007, chs. 1-2 (“Peterson”) |
| 1034 | U.S. Patent Application Publication No. 2009/0187654 (“Raja”) |
| 1035 | U.S. Patent Application Publication No. 2002/0169818 (“Stewart”) |
| 1036 | U.S. Patent No. 6,351,775 (“Yu-775”) |
| 1037 | U.S. Patent Application Publication No. 2002/0059371 (“Jamail”) |
| 1038 | P. Mell, T. Bergeron, and D. Henning, “Creating a Patch and Vulnerability Management Program,” NIST Special Publication 800-40 Version 2.0, 2005 (“SP 800-40 Ver. 2”) |
| 1039 | U.S. Patent Application Publication No. 2004/0153473 (“Hutchinson”) |
| 1040 | U.S. Patent Application Publication No. 2006/0236083 (“Fristch”) |
| 1041 | U.S. Patent Application Publication No. 2010/0115613 (“Ramaswami”) |
| 1042 | U.S. Patent No. 8,041,784 (“Amidon”) |
| 1043 | U.S. Patent No. 8,655,838 (“Wright”) |
| 1044 | A. Rowstron and P. Druschel, “Pastry: Scalable, Decentralized Object Location, and Routing for Large-Scale Peer-to-Peer Systems.” IFIP/ACM International Conference on Distributed Systems Platforms and Open Distributed Processing: Middleware 2001, pp. 329-350 (2001) (“Rowstron”) |
| 1045 | S. Ratnasamy, M. Handley, R. Karp and S. Shenker, “Topologically-aware overlay construction and server selection.” Proceedings Twenty-First Annual Joint Conference of the IEEE Computer and Communications Societies, vol. 3, pp. 1190-1199 (2002) (“Ratnasamy”) |

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| 1046 | V. N. Padmanabhan and L. Subramanian, “An Investigation of Geographic Mapping Techniques for Internet Hosts.” ACM SIGCOMM Computer Communication Review, vol. 3, No. 4, pp. 173–185 (2001) (“Padmanabhan”) |
| 1047 | M.J. Freedman, K. Lakshminarayanan, and D. Mazières, “OASIS: Anycast for Any Service.” Proceedings of the 3rd Conference on Networked Systems Design & Implementation, vol. 3, pp. 129-142 (2006) (“Freedman-2006”) |
| 1048 | S. Agarwal and J.R. Lorch, “Matchmaking for Online Games and Other Latency-Sensitive P2P Systems.” ACM SIGCOMM Computer Communication Review, vol. 39, No. 4, pp. 315-326 (2009) (“Agarwal”) |
| 1049 | U.S. Patent No. 8,144,611 (“Agarwal-611”) |
| 1050 | H. Casanova, “Benefits and Drawbacks of Redundant Batch Requests.” Journal of Grid Computing, vol. 5, pp. 235–250 (2007) (“Casanova”) |
| 1051 | U.S. Patent Application Publication No. 2008/0298328 (“Sharma”) |
| 1052 | U.S. Patent Application Publication No. 2009/0204700 (“Sudhakar”) |
| 1053 | U.S. Patent Application Publication No. 2006/0212584 (“Yu”) |
| 1054 | U.S. Patent No. 7,865,585 (“Samuels”) |
| 1055 | S. J. Murdoch, “New Tor distribution for testing: Tor Browser Bundle,” January 30, 2008 post to tor-talk mailing list, available at https://lists.torproject.org/pipermail/tor-talk/2008-January/007837.html |
| 1056 | U.S. Patent Application Publication No. 2009/0222515 (“Thompson”) |
| 1057 | Defendants’ Section 282 Disclosure, <i>Bright Data Ltd. v. Teso LT et al.</i> , Case No. 2:19-cv-00395-JRG, D.I. 450 (E.D. Tex. July 16, 2021) |
| 1058 | Docket, <i>Bright Data Ltd. v. NetNut Ltd.</i> , Case No. 2:21-cv-00225-JRG (E.D. Tex.) (as of Nov. 2, 2021) |
| 1059 | Notice of Filing Invalidation Contentions, <i>Bright Data Ltd. v. Tefincom S.A. d/b/a NordVPN</i> , Case No. 2:19-cv-00414-JRG, D.I. 37 (E.D. Tex. Mar. 3, 2021) |

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