

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

**MAJOR DATA UAB,**  
Petitioner

v.

**BRIGHT DATA LTD.,**  
Patent Owner.

---

Case No. IPR2022-\_\_\_\_\_  
Patent No. 10,257,319

---

**EXPERT DECLARATION OF KEITH J. TERUYA**

**Contents**

**1 INTRODUCTION 1**

**2 QUALIFICATIONS 2**

**3 My Understanding of Claim Construction 4**

**4 My Understanding of Anticipation 4**

**5 My Understanding of Obviousness 4**

**6 Level of Ordinary Skill in the Art 7**

**7 OVERVIEW OF THE '319 DISCLOSURE AND CLAIMS 8**

7.1 Background of the '319 Patent (Ex. 1001) . . . . . 8

7.2 The Claims . . . . . 11

**8 OVERVIEW OF THE STATE OF THE ART AT THE TIME OF FILING 12**

8.1 Crowds . . . . . 12

8.2 Border . . . . . 14

8.3 MorphMix . . . . . 16

8.4 Internet RFCs and Standards . . . . . 17

**9 GROUND 1: ANTICIPATION OF CLAIMS 1, 19, 21-29 BY CROWDS 18**

9.1 Claim 1 . . . . . 18

9.2 Claims 19, and 28-29 . . . . . 25

9.2.1 Claims 21-22 and 24-25 . . . . . 26

9.3 Claim 23 . . . . . 27

9.4 Claim 26 . . . . . 27

9.5 Claim 27 . . . . . 28

**10 GROUND 2: OBVIOUSNESS OF CLAIMS 1-2, 14-15, 17-19, and 21-29 BY CROWDS + RFC 2616 + GENERAL KNOWLEDGE 28**

10.1 Claim 1 . . . . . 29

10.2 Claim 2 . . . . . 31

10.3 Claims 14-15 . . . . . 32

10.4 Claims 17-18 . . . . . 32

10.5 Claims 19, and 21-29 . . . . . 33

**11 GROUND 3: ANTICIPATION OF CLAIMS 1, 12, 14, 21-22, 24-25, AND 27-29 BY BORDER 33**

11.1 Claim 1 . . . . . 33

11.2 Claim 12 . . . . . 40

11.3 Claim 14 . . . . . 40

11.4 Claims 21-22 and 24-25 . . . . . 41

11.5 Claim 27 . . . . . 42

11.6 Claims 19 and 28-29 . . . . . 43

**12 GROUND 4: OBVIOUSNESS OF CLAIMS 1, 12, 14-15, 17-18, 21-22, 24-25, and 27-29 BY BORDER + RFC 2616 + GENERAL KNOWLEDGE 45**

12.1 Claim 1 . . . . . 46

12.2 Claim 15 . . . . . 47

12.3 Claims 17 and 18 . . . . . 48

12.4 Claims 12, 14, 21-22, 24-25, and 27-29 . . . . . 49

**13 GROUND 5: ANTICIPATION OF CLAIMS 1, 17, 19, 21-29 BY MORPHMIX 49**

13.1 Claim 1 . . . . . 51  
13.2 Claim 17 . . . . . 57  
13.3 Claims 19 and 28-29 . . . . . 59  
    13.3.1 Claim 23 . . . . . 60  
13.4 Claims 21-22 and 24-25 . . . . . 60  
13.5 Claim 26 . . . . . 62  
13.6 Claim 27 . . . . . 62

**14 GROUND 6: OBVIOUSNESS OF CLAIMS 1-2, 14-15, 17-19, and  
21-29 BY MORPHMIX + RFC 2616 + GENERAL KNOWLEDGE 63**

14.1 Claim 1 . . . . . 63  
14.2 Claim 2 . . . . . 64  
14.3 Claims 14 and 15 . . . . . 66  
14.4 Claim 18 . . . . . 66  
14.5 Claims 19 and 21-29 . . . . . 67

<b>EXHIBITS LIST</b>	
1001	United States Patent No. 10,257,319 to Shribman <i>et al.</i>
1002	File History for United States Patent No. 10,257,319
1003	Petitioners' Chart of Challenged Claims
1004	Luminati's Opposition to Defendants' Motion to Dismiss, <i>Luminati Networks Ltd. v. Teso LT, UAB et al.</i> , 2:19-cv-00395-JRG (E.D. Tex.)
1005	Declaration of Keith J. Teruya with curriculum vitae
1006	Reiter, M. <i>et al.</i> , Crowds: Anonymity for Web Transactions, ACM Transactions on Information and System Security, Vol. 1, No. 1, Nov. 1998, at 66-92
1007	Declaration of Scott Delman (regarding Crowds)
1008	Rennhard, M., MorphMix – A Peer-to-Peer-based System for Anonymous Internet Access (2004) (Doctoral Thesis)
1009	Declaration of Marc Rennhard (regarding MorphMix)
1010	Declaration of Bernhard Plattner (regarding MorphMix)
1011	Declaration of Andreas Berz (regarding MorphMix)
1012	United States Patent No. 6,795,848 to Border <i>et al.</i>
1013	Fielding, R. <i>et al.</i> , "Hypertext Transfer Protocol – HTTP/1.1", RFC 2616, June 1999
1014	Socolofsky, T. <i>et al.</i> , "TCP/IP Tutorial", RFC 1180, January 1991
1015	Postel, J., "Internet Protocol", STD 5, RFC 791, September 1981
1016	Braden, R., Ed., "Requirements for Internet Hosts – Communication Layers", STD 3, RFC 1122, October 1989
1017	Claim Construction Opinion and Order, <i>Luminati Networks Ltd. v. Teso LT, UAB et al.</i> , 2:19-cv-00395-JRG (E.D. Tex.)
1018	W3C, Glossary of Terms for Device Independence, January 2005
1019	U.S. Patent Publication No. 2009/0037977 to Gai <i>et al.</i>
1020	Supplemental Claim Construction Order, <i>Luminati Networks Ltd. v. Teso LT, UAB et al.</i> , 2:19-cv-00395-JRG (E.D. Tex.)
1021	Transcript of Pretrial Conference, <i>Luminati Networks Ltd. v. Teso LT, UAB et al.</i> , 2:19-cv-00395-JRG (E.D. Tex.)
1022	Declaration of Wensheng Ma (regarding exhibits submitted herein)

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.