

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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NETNUT LTD.,

Petitioner

v.

BRIGHT DATA LTD. (f/k/a Luminati Networks Ltd.),

Patent Owner

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Case IPR2021-00465

Patent No. 9,742,866

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**UPDATED MANDATORY NOTICES  
PURSUANT TO 37 C.F.R. §§ 42.8(b)(2), 42.8(b)(3), and 42.8(b)(4)**

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

Pursuant to 37 C.F.R. §§ 42.8(b)(2), 42.8(b)(3), and 42.8(b)(4), Patent Owner Bright Data Ltd. hereby provides the following updated mandatory notices in connection with IPR2021-00465 of Patent No. 9,742,866 entitled “System and method for improving internet communication by using intermediate nodes.”

### **I. Real Parties-In-Interest**

The real party in interest remains the same.

### **II. Related Matters**

The related matters have changed. The same petitioner, NetNut Ltd., is involved in the following administrative proceedings:

- IPR2021-00458 of Patent No. 9,241,044 (related proceeding);
- IPR2021-00465 of Patent No. 9,742,866 (this proceeding).

Patent No. 9,742,866 is based upon a divisional of the application that issued as Patent No. 9,241,044.

Other petitioners were/are involved in the following administrative proceedings:

- IPR2020-00166 of Patent No. 9,241,044 (terminated by settlement);
- IPR2020-00167 of Patent No. 9,742,866 (terminated by settlement);
- IPR2021-01502 of Patent No. 9,241,044 (seeking joinder to IPR2021-00458);

- IPR2021-01503 of Patent No. 9,742,866 (seeking joinder to IPR2021-00465).

Court cases involving Patent Nos. 9,241,044 and 9,742,866 are styled as follows:

- *Luminati Networks Ltd. v. UAB Tesonet*, No. 2:18-cv-299 (E.D. Texas)(closed);
- *Luminati Networks Ltd. v. BI Science Inc.*, No. 2:18-cv-483 (E.D. Texas)(dismissed, but pending Rule 60 Motion in the district court; subject to deactivated appeals);
- *Luminati Networks Ltd. v. IP Ninja Ltd.*, No. 2:19-cv-196 (E.D. Texas)(closed);
- *Luminati Networks Ltd. v. BI Science (2009) Ltd.*, No. 2020-2118 (Fed. Cir.)(deactivated appeal pending Rule 60 Motion in the district court);
- *Luminati Networks Ltd. v. BI Science, Inc.*, No. 2020-2181 (Fed. Cir.)(deactivated appeal pending Rule 60 Motion in the district court).

Petitioner has also filed for *inter partes* review proceedings, challenging other patents owned by Patent Owner, not Patent Nos. 9,241,044 and 9,742,866. They are: IPR2021-01492 (pending) and IPR2021-01493 (pending).

Petitioner has also filed Requests for Reexamination with the USPTO on other patents owned by Patent Owner, not Patent Nos. 9,241,044 and 9,742,866. They are: Control Nos. 90/014,624 (pending) and 90/014,652 (pending).

There are other district court cases between Patent Owner and Petitioner that involve other patents owned by Patent Owner, not Patent Nos. 9,241,044 and 9,742,866. They are styled as follows:

- *Luminati Networks Ltd. f/k/a Hola Networks Ltd. v. NetNut Ltd.*, No. 2:20-cv-00188 (E.D. Tex.)(pending);
- *Bright Data Ltd. v. NetNut Ltd.*, No. 2:21-cv-00225 (E.D. Tex.)(pending).

### III. Lead and Back-Up Counsel

The back-up counsel has changed.

Lead Counsel	Back-Up Counsel
Thomas M. Dunham RuyakCherian LLP 1901 L Street NW, Suite 700 Washington, D.C. 20036 Tel. (202) 838-1567 Fax (202) 478-1715 tomd@ruyakcherian.com USPTO Customer No. 144371 USPTO Reg. No. 39,965	Elizabeth A. O'Brien RuyakCherian LLP 1901 L Street NW, Suite 700 Washington, D.C. 20036 Tel. (202) 873-1726 Fax (202) 478-1715 elizabetho@ruyakcherian.com USPTO Customer No. 144371 USPTO Reg. No. 76,105

### IV. Service Information

The service information has changed.

Electronic Mail	1. tomd@ruiakcherian.com 2. elizabetho@ruiakcherian.com
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Additionally, Patent Owner consents to electronic service via email at the email addresses noted above.

Respectfully submitted,

Date: September 27, 2021

By: /s/ Thomas M. Dunham  
Thomas M. Dunham  
Reg. No. 39,965

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ATTORNEY FOR PATENT OWNER,  
BRIGHT DATA LTD.

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies the  
UPDATED MANDATORY NOTICES PURSUANT TO 37 C.F.R. §§ 42.8(b)(2),  
42.8(b)(3), and 42.8(b)(4) was served on the undersigned date via email, as  
authorized by Petitioner, at the following email addresses:

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Respectfully submitted,

Date: September 27, 2021

By: /s/ Thomas M. Dunham

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