

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETNUT LTD.,

Petitioner

v.

BRIGHT DATA LTD.,

Patent Owner

Case IPR2021-00465

U.S. Patent No. 9,742,866

DECLARATION OF THOMAS M. DUNHAM

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

I, Thomas M. Dunham, declare as follows under penalty of perjury:

1. I am lead counsel for Patent Owner.
2. Concurrently filed with Patent Owner's Preliminary Response are the following exhibits.
3. Exhibit 2001 is a true and correct copy of the expert declaration of Dr. V. Thomas Rhyne.
4. Exhibit 2002 is a true and correct copy of the CV of Dr. V. Thomas Rhyne.
5. Exhibit 2003 is a true and correct copy of the exhibits considered by Dr. V. Thomas Rhyne.
6. Exhibit 2005 is a true and correct copy of U.S. Patent No. 7,203,741 to Marco et al.
7. Exhibit 2006 is a true and correct copy of U.S. Pat. App. Pub. No. 2003/0204602 to Hudson et al.
8. Exhibit 2007 is a true and correct copy of Internet Engineering Task Force (IETF) RFC 2547 "BGP/MPLS VPNs," Mar. 1999.
9. Exhibit 2008 is a true and correct copy of Internet Engineering Task Force (IETF) RFC 4026 "Provider Provisioned Virtual Private Network (VPN) Terminology," Mar. 2005.

10. Exhibit 2010 is a true and correct copy of A Brief History of P2P Content Distribution, <https://medium.com/paratii/a-brief-history-of-p2p-content-distribution-in-10-major-steps-6d6733d25122>, last visited on May 22, 2021.

11. Exhibit 2011 is a true and correct copy of Peer-to-peer – Wikipedia, <https://en.wikipedia.org/wiki/Peer-to-peer>, last visited on May 22, 2021.

12. Exhibit 2012 is a true and correct copy of Content delivery network – Wikipedia, https://en.wikipedia.org/wiki/Content_delivery_network, last visited on May 22, 2021.

I declare under the laws of the United States that the foregoing is true and correct.

Executed on May 24, 2021.

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