

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETNUT LTD.,
Petitioner,
v.
BRIGHT DATA LTD. (f/k/a Luminati Networks Ltd.),
Patent Owner.

Cases IPR2021-00465
Patent No. 9,742,866

**PETITIONER'S REQUEST FOR ORAL ARGUMENT
PURSUANT TO 37 C.F.R. § 42.70(a)**

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.70(a), 35 U.S.C. § 316(a)(10), and the Board's March 17, 2022 Revised Scheduling Order (Paper 21), Patent Owner respectfully requests oral argument in this proceeding (currently scheduled for June 10, 2022), on the following issues:

- Whether Patent Owner's Non-contingent, Revised Motion to Amend (Paper 20) ("RMTA") meets applicable statutory and regulatory requirements, whether the proposed substitute claims are patentable, and whether the RMTA is otherwise grantable;
- Any issues subsidiary to the above issues, including, but not limited to, claim construction, indefiniteness, new matter, obviousness-type double patenting, assessment of evidence, and admissibility and sufficiency of evidence;
- Any other issues specified by Patent Owner in its Request for Oral Argument; and
- Any other issues the Board deems necessary for issuing a final written decision;

Petitioner respectfully requests 60 minutes of argument time. Petitioner is prepared to participate live in person or via remote video teleconferencing and/or telephonically, as the Board may direct. If conducted live, Petitioner respectfully requests to use the hearing room audio/visual equipment, including the easels, ELMO, and projector and screen for presenting documents from a laptop computer.

If conducted remotely, Petitioner respectfully requests that it be permitted to introduce demonstrative exhibits via screensharing methods.

Dated: April 24, 2022

Respectfully submitted,

/RonaldAbramson/
Ronald Abramson
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned hereby certifies that a true and correct copy of the foregoing PETITIONER’S REQUEST FOR ORAL ARGUMENT was served on April 24, 2022 on the counsel of record for the Patent Owner, via electronic mail, as authorized by Patent Owner, on:

Elizabeth O’Brien, elizabetho@ruiyakcherian.com
Thomas Dunham, tomd@ruiyakcherian.com

Dated: April 24, 2022

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