

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.,

Patent Owner

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Case IPR2021-00465

Patent No. 9,742,866

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**PATENT OWNER'S REQUEST FOR ORAL ARGUMENT**

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. § 42.70 and the Board's Revised Scheduling Order (Paper 21), Patent Owner respectfully requests oral argument in this proceeding, IPR2021-00465, which is currently scheduled for June 10, 2022.

Given the similarity of issues in this proceeding and the related proceeding, IPR2021-00458, Patent Owner respectfully requests that the parties present their oral arguments for both cases in a single hearing.<sup>1</sup> Patent Owner respectfully requests that each party be provided with ninety minutes of argument time in connection with IPR2021-00458 and IPR2021-00465, collectively.

Alternatively, if the Board wishes to conduct separate hearings, Patent Owner respectfully requests that each party be provided with sixty minutes of argument time in connection with each proceeding.

Without intending to waive any issues not specifically identified, Patent Owner wishes to present oral argument on the following issues in IPR2021-00465:

1. Petitioner has not met its burden of proof that the revised, proposed, substitute claims ("RPSC") are unpatentable;
2. The Board's Preliminary Guidance (Paper 19) on Patent Owner's Non-contingent, Motion to Amend (Paper 17, "Original MTA");

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<sup>1</sup> Patent Owner has concurrently filed a substantially similar Request for Oral Argument in the related proceeding, IPR2021-00458.

3. Any of the arguments in Patent Owner's Non-contingent, Revised Motion to Amend (Paper 20, "Revised MTA") and the proper scope of the RPSC;
4. Any of the arguments in Petitioner's Opposition (Paper 22) to the Revised MTA;
5. Any of the arguments in Patent Owner's forthcoming Reply to Petitioner's Opposition to the Revised MTA;
6. Any of the arguments in Petitioner's forthcoming Sur-Reply to Patent Owner's Reply to Petitioner's Opposition to the Revised MTA;
7. Any issues specified by Petitioner in its Request for Oral Argument (Paper 24);
8. Rebuttal of any issues properly raised by Petitioner in this proceeding;
9. Any procedural or evidentiary issues in this proceeding;
10. Any other issues on which the Board seeks information or clarification.

Patent Owner respectfully requests that the Board provide audio-visual equipment to display demonstratives and exhibits during oral argument. To the extent oral argument will be conducted by video conference in light of the COVID-

19 pandemic, Patent Owner respectfully requests that the Board provide a video conferencing platform and a public telephone line.

Respectfully submitted,

Date: April 28, 2022

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  
PATENT OWNER'S REQUEST FOR ORAL ARGUMENT was served on the  
undersigned date via email, as authorized by Petitioner, at the following email  
addresses:

ron.abramson@listonabramson.com

ari.jaffess@listonabramson.com

michael.lewis@listonabramson.com

Respectfully submitted,

Date: April 28, 2022

By: /s/ Thomas M. Dunham

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