UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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OXYLABS, UAB,
Petitioner

v.

BRIGHT DATA LTD.
Patent Owner

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Declaration of Eagle H. Robinson

I, Eagle H. Robinson, declare as follows:

1. I am over the age of twenty-one and have never been convicted of any felony. I have personal knowledge of the following facts and statements in this declaration and, if called as a witness, I could and would testify competently thereto.

2. I am the Head of IP Transactions and Patent Prosecution, United States, for Norton Rose Fulbright US LLP. I represented Oxylabs as Lead Counsel in *Metacluster LT, UAB v. Bright Data Ltd.*, IPR2022-00936.

3. I understand that Exhibit 1005 to the Petition is a dissertation entitled "Perspective Access Networks" ("Goodell"). To the best of my recollection, I have never seen or heard of Goodell before June 2023, and had not seen or heard of Goodell before filing the petition in IPR2022-00936. I was not aware of Goodell before the filing of the petition in IPR2022-00936.

4. Norton Rose Fulbright engaged a prior-art search before filing the petition in IPR2022-00936. To the best of my recollection, the prior-art search did not locate Goodell.

5. In signing this declaration, I understand that the declaration will be filed as evidence in a contested case before the Patent Trial and Appeal Board of the United States Patent and Trademark Office.

6. I declare that all statements made herein of my knowledge are true, that all statements made on information and belief are believed to be true, and that these

statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

7. I declare under penalty of perjury that the foregoing is true and correct.

Eagle H. Robinson (Reg. No. 61,361)