UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

OXYLABS LT, UAB,

Petitioner

v.

BRIGHT DATA LTD.,

Patent Owner

Case IPR2024-00126

Patent No. 11,616,826

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 Scheduling Order (Paper 11), Patent Owner preliminarily requests oral argument in this proceeding, IPR2024-00126, which is currently scheduled for March 12, 2025. *See* Paper 11 at 11. Patent Owner makes this preliminary request in view of the overlapping claim construction issues currently on appeal before the Federal Circuit in Lead Case No. 23-2144 involving four related patents. Patent Owner expects the Federal Circuit's decision may significantly impact this proceeding and thus, Patent Owner is being mindful of the Board's limited resources.

In the interests of efficiency, Patent Owner respectfully, preliminarily requests the following in order to answer any questions the Board may have[1]:

- Each party be provided with fifteen (15) minutes of argument time;
- Patent Owner be provided the opportunity to present a brief sur-rebuttal within the allotted argument time;
- The Board hold the oral argument remotely by video conference;
- The Board provide a video conferencing platform and a public telephone line

[1] Patent Owner does not intend to waive any issues not specifically identified in this paper. Patent Owner reserves all rights to address any issues raised in the papers and/or in Petitioner's Request for Oral Argument (not yet filed).

for the oral argument; and

- Patent Owner be provided the opportunity to display demonstratives and/or exhibits during the oral argument.

Patent Owner understands that briefing has not yet concluded in this proceeding. *See* Paper 16 (moving DUE DATE 3 from January 10, 2025 to **February 10, 2025**). After briefing has concluded, Patent Owner will endeavor to reach agreement with Petitioner regarding expungement/withdrawal of any requests for oral argument.

Respectfully submitted,

Date: January 31, 2025

By: /s/ *Thomas M. Dunham*

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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 this paper was served on the undersigned date via email, as authorized by Petitioner, at the following email addresses:

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Respectfully submitted,

Date: January 31, 2025

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