

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 11,616,826

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Petitioner respectfully requests oral argument, with 60 minutes allotted to each side for presenting arguments. Without waiving consideration of any other issues, Petitioner specifies the issues to be argued as, the grounds of unpatentability asserted by the Petition, including:

1. Ground 1: Claims 1-5, 10, 12, 15-18, 19, and 21-25 are invalid under §103(a) over U.S. Pat. No. 6,785,705 (“Kocherlakota”);
2. Ground 2: Claims 6-9 are invalid under §103(a) over Kocherlakota in view of RFC 1122 and knowledge of a POSITA;
3. Ground 3: Claims 1-6, 12, 15-17, 18, 19, and 21-25 are invalid under §103(a) over U.S. Pat. No. 6,389,462 (“Cohen”);
4. Ground 4: Claims 6-9 are invalid under §103(a) over Cohen in view of RFC 1122 and knowledge of a POSITA;
5. The preclusion of Patent Owner’s arguments that were raised or could have been raised in IPR2022-00687;
6. any other issues raised in the papers;
7. any issues specified by Patent Owner in a request for oral argument;
8. any other issues that the Board finds appropriate.

Pursuant to the Office’s notice issued June 23, 2022, Petitioner understands that PTAB oral hearings scheduled to take place after July 11, 2022, may be conducted in person (e.g., when requested by all parties), but that parties will still

have the option to appear remotely. Petitioner would welcome an opportunity to appear in person if doing so would be helpful for the panel; however, if some or all of the panel will attend remotely regardless, Petitioner would prefer for all attendees to be remote to limit the technical challenges inherent in a hybrid format.

If the hearing is held in-person, Petitioner also respectfully requests that audio/visual equipment be made available for displaying demonstrative exhibits, including a screen and a VGA or HDMI cable for connecting the screen to a laptop if the hearing is in person, or a software platform that permits the display of demonstrative exhibits if the hearing is remote.

Dated: January 31, 2025

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

/Eagle H. Robinson/

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

Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e), the undersigned certifies that on January 31, 2025, this paper was served on Patent Owner via email (by consent), at the following email address(s):

tomd@cherianllp.com

elizabetho@cherianllp.com

/Eagle H. Robinson/
Eagle H. Robinson, Reg. No. 61,361