

Filed on behalf of: Meta Platforms, Inc.

Filed: August 31, 2023

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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META PLATFORMS, INC.  
Petitioner,

v.

ANGEL TECHNOLOGIES GROUP LLC,  
Patent Owner.

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Case No. IPR2023-00057  
U.S. Patent No. 8,954,432

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**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Meta Platforms, Inc. ("Petitioner") submits the following objections to evidence submitted by Patent Owner Angel Technologies Group LLC ("Patent Owner"). Petitioner's objections apply equally to Patent Owner's reliance on this evidence in any subsequently filed documents or further proceedings in this matter. These objections are timely, having been filed and served within five business days of service. Notwithstanding these objections, Petitioner expressly reserves the right to rely on any evidence submitted by Patent Owner, including on the ground that such evidence constitutes a party admission.

### **Objections**

#### **Exhibit 2021**

Petitioner objects to this exhibit as inadmissible hearsay under FRE 801 and 802 not falling under any exception, and as improper expert testimony under FRE 702 and 703, to the extent it impermissibly acts as a conduit for hearsay, including the hearsay objected to herein, and does not rely on the kinds of facts or data that experts in the relevant field would reasonably rely on in forming an opinion on the subject without providing the underlying facts, data, and other required disclosures.

Petitioner further objects to this exhibit for lack of foundation and lack of personal knowledge under FRE 602, and as improper lay testimony under FRE 701,

to the extent it offers testimony in areas outside of Dr. Saber's area of expertise or fails to properly provide the underlying facts, data, and other required disclosures.

Respectfully submitted,

Dated: August 31, 2023

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of Petitioner's Objections to Patent Owner's Evidence was served via electronic email on Patent Owner's counsel of record listed below, pursuant to its Mandatory Notices, on August 31, 2023:

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