

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner,

v.

ANGEL TECHNOLOGIES LLC,
Patent Owner.

Case IPR2023-00057
Patent 8,954,432

Case IPR2023-00058
Patent 9,959,291

Case IPR2023-00059
Patent 10,417,275

Case IPR2023-00060
Patent 10,628,480

**DECLARATION OF CHRIS MALONE
UNDER 37 C.F.R. § 1.131**

I, Chris Malone, declare:

1. I am a citizen of the United States and am over 21 years of age and in all respects fully competent to make this Declaration. I make this Declaration based on facts within my personal knowledge, and if called as a witness, I could and would competently testify to the matters set forth herein.

2. From October 1998 to August 2000, I lived with Mark Frigon, while he was developing his photo-tagging invention, and he created a computer-based application that could be accessed via the internet. I understand that he also filed patent applications intended to cover his inventions.

3. While I was living with Mr. Frigon, he developed a personal website for me, Cmalone.com. At the same time, I was aware he was working on developing a photo-tagging technology during the 1999-2000 period. Throughout the time we lived together, he would always be downstairs working on code and demonstrating the developments he was making.

4. For example, I recall him first demonstrating that he could load images into the website he had developed and identify individuals in the photo by labeling their faces. As he continued working on the software code, he could later enter individuals' names and then pull up all the photos that they had been identified in.

5. Although I did not have a technical background to understand the code, I recall seeing voluminous code that he had developed and the finished product in practice as he demonstrated his website and capabilities to me during the development.

6. This was something I witnessed him working on pretty much daily throughout the time we lived together (from 1998 to 2000), and I recall him later leaving his full time employment so that he could devote his time fully to developing the technology. It was a continuous process—he never stopped working on the software during the entire time we lived together.

7. In summary, by the time I had moved out of our apartment in August 2000, Mark Frigon had demonstrated to me his invention and its functionality.

8. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 2/12/23

Chris Malone

Chris Malone