UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC., Petitioner,

v.

ANGEL TECHNOLOGIES LLC, Patent Owner.

Case IPR2023-00058 U.S. Patent 9,959,291

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107

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Submitted Electronically via the Patent Review Processing System



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V.	Argument				
	A. Sharpe Does Not Qualify as Prior Art				
	As Shown Below, Patent Owner Had Conceived and Reasonably Continued Activity to Reduce to Practice the Claim Invention Prior to Sharpe's Priority Date				
	В.	Claim 24 is a Apparatus Corollary for Method Claim 1 and Was Likewise Conceived and Reduced to Practice Prior to Sharpe's Priority Date			
	C.	Claim 25 is a Non-Transitory Computer Readable Medium Corollary for Method Claim 1 and Was Likewise Conceived and Reduced to Practice Prior to Sharpe's Priority Date			
	D.	Dependent Claims 2-24 are Patentable for the Same Reasons as the Independent Claims from Which They Depend			
	Е.	The Petition Failed To Present Proper Claim Construction As Statutorily Required.			
	F.	The Petition Fails to Establish a Proper Motivation to Combine References			
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