

Filed on behalf of: Meta Platforms, Inc.

Filed: August 31, 2023

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.
Petitioner,

v.

ANGEL TECHNOLOGIES GROUP LLC,
Patent Owner.

Case No. IPR2023-00058
U.S. Patent No. 9,959,291

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

By: /Lisa K. Nguyen/
Lisa K. Nguyen (Reg. No. 58,018)
lisa.nguyen@allenoverly.com
Allen & Overy LLP
550 High Street
Palo Alto, CA 94301
Telephone: (650) 388-1724

*Counsel for Petitioner
Meta Platforms, Inc.*

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:

Scott W. Hejny
Reg. No. 45,882
McKool Smith, P.C.
300 Crescent Court, Suite 1500
Dallas, TX 75201
Telephone: (214) 978-4000
Facsimile: (214) 978-4044
shejny@mckoolsmith.com

Elizabeth Bernard
Reg. No. 51,465
Arvind Jairam
Reg. No. 62,759
McKool Smith, P.C.
1999 K St. NW, Suite 600
Washington, DC 20006
Telephone: (202) 370-8300
EBernard@mckoolsmith.com
ajairam@mckoolsmith.com

Eliza Beeney
(*pro hac vice*)
McKool Smith, P.C.
One Manhattan West
395 9th Avenue, 50th Floor
New York, NY 10001
Telephone: (212) 402-9818
ebeeney@mckoolsmith.com

Kaylee Hoffner
(*pro hac vice*)
McKool Smith, P.C.
600 Travis Street, Suite 7000
Houston, TX 77002
Telephone: (713) 485-7320
khoffner@mckoolsmith.com

By: /Lisa K. Nguyen/
Lisa K. Nguyen (Reg. No. 58,018)
lisa.nguyen@allenoverly.com
Allen & Overy LLP
550 High Street
Palo Alto, CA 94301
Telephone: (650) 388-1724

*Counsel for Petitioner
Meta Platforms, Inc.*