

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

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**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF  
ELIZA BEENEY UNDER 37 C.F.R. §42.10(c)**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313

Pursuant to Rule 42.10(c), Patent Owner Angel Technologies Group LLC requests that the Board recognize Eliza Beeney as counsel *pro hac vice* during this proceeding.

## **I. TIME FOR FILING**

This Motion is timely because it is being filed no sooner than twenty-one (21) days after service of the Petition in this proceeding, which occurred on October 26, 2022.

## **II. STATEMENT OF FACTS**

The following statement of facts show that there is good cause for the Board to recognize Ms. Beeney as counsel *pro hac vice* in this proceeding.

Ms. Beeney is an experienced litigation attorney and has an established familiarity with the subject matter at issue in this proceeding. Ms. Beeney has been involved in numerous complex litigations in federal courts. Ms. Beeney's biography is attached hereto as Exhibit 2001.

Ms. Beeney has reviewed U.S. Patent No. 9,959,291, and the petition already filed in this proceeding.

Further, Ms. Beeney is counsel of record in the litigation between the parties entitled *Angel Technologies Group LLC v. Facebook, Inc.*, before the U.S. District Court for the Central District of California, Civil Action No. 2:21-cv-08459, and, as such, is familiar with the subject matter at issue in this proceeding.

### III. DECLARATION OF ELIZA BEENEY

Patent Owner's Motion for *Pro Hac Vice* Admission is accompanied by the Declaration of Ms. Beeney, filed as Exhibit 2002, attesting to the requirements laid out in the Board's Order Authorizing Motion for *Pro Hac Vice* Admission in Case IPR2013-00639 (Paper 7).

For the foregoing reasons, as well as the reasons contained in the attached declaration, Patent Owner respectfully requests admission of Eliza Beeney as counsel *pro hac vice* during this proceeding.

Dated: November 18, 2022

Respectfully submitted,

s/ Ashley Moore

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**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that the foregoing **PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF ELIZA BEENEY UNDER 37 C.F.R. §42.10(c)** has been served on Petitioner via email on the following counsel of record for Petitioner:

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Dated: November 18, 2022

By: /s/ Ashley N. Moore  
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