

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

**PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF
KAYLEE E. HOFFNER 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 Kaylee E. Hoffner 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. Hoffner as counsel *pro hac vice* in this proceeding.

Ms. Hoffner is an experienced litigation attorney and has an established familiarity with the subject matter at issue in this proceeding. Ms. Hoffner has been involved in numerous complex litigations in federal courts. Ms. Hoffner's biography is attached hereto as Exhibit 2003.

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

III. DECLARATION OF KAYLEE E. HOFFNER

Patent Owner's Motion for *Pro Hac Vice* Admission is accompanied by the Declaration of Ms. Hoffner, filed as Exhibit 2004, 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 Kaylee E. Hoffner as counsel *pro hac vice* during this proceeding.

Dated: November 18, 2022

Respectfully submitted,

s/ Ashley Moore

Ashley N. Moore
Reg. No. 51667
amoore@mckoolsmith.com
McKool Smith, P.C.
300 Crescent Court, Suite 1500
Dallas, TX 75201
Telephone (214) 978-4000
Facsimile: (214) 978-4044

Eliza Beeney (*pro hac vice requested*)
ebeeney@mckoolsmith.com
McKool Smith, P.C.
One Manhattan West
395 9th Avenue, 50th Floor
New York, NY 10001
Telephone (212) 402-9400
Facsimile: (212) 402-9444

Kaylee Hoffner
(*pro hac vice requested*)
khoffner@mckoolsmith.com
McKool Smith, P.C.
600 Travis Street, Suite 7000
Houston, TX 77002
Telephone: (713) 485-7320
Facsimile: (713) 485-7344

*Counsel for Angel Technologies Group
LLC*

CERTIFICATION OF SERVICE

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

Lisa K. Nguyen
lisa.nguyen@allenoverly.com
David M. Tennant
david.tennant@allenoverly.com
Alan M. Billharz
alan.billharz@allenoverly.com
Chitrajit Chandrashekar
chitrajit.chandrashekar@allenoverly.com
Eric E. Lancaster
eric.lancaster@allenoverly.com
Sara L. Townsend
sara.townsend@allenoverly.com

Dated: November 18, 2022

By: /s/ Ashley N. Moore
Ashley N. Moore
Reg. No. 51667