

Filed on behalf of: Meta Platforms, Inc.

Filed: May 25, 2023

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 No. IPR2023-00059  
U.S. Patent No. 10,417,275

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**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 ten business days of the institution of the trial. 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 2005**

Petitioner objects to this exhibit as improper lay testimony under FRE 701, to the extent it offers testimony in the form of an opinion that is based on scientific, technical, or other specialized knowledge within the scope of FRE 702. Petitioner further objects to this exhibit for lack of foundation and lack of personal knowledge under FRE 602, and as inadmissible hearsay under FRE 801 and 802 not falling under any exceptions, including those of FRE 803, 804, 805, or 807.

#### **Exhibits 2006-2011**

Petitioner objects to these exhibits as not properly authenticated under FRE 901 because Patent Owner has not presented sufficient evidence to show that

they are authentic or self-authenticating under FRE 902. Petitioner further objects to these exhibits under FRE 106 (completeness), as these exhibits are incomplete and only include select portions of larger documents or collections of documents that should be considered in connection with these exhibits. To the extent Patent Owner relies on these documents for the truth of the matter asserted, Petitioner objects to these exhibits as inadmissible hearsay under FRE 801 and 802 not falling under any exceptions, including those of FRE 803, 804, 805, or 807.

### **Exhibit 2012**

Petitioner objects to this exhibit as not properly authenticated under FRE 901 because Patent Owner has not presented sufficient evidence to show that it is authentic or self-authenticating under FRE 902. Petitioner further objects to this exhibit under FRE 106 (completeness), as this exhibit is incomplete and only includes select portions of larger documents or collections of documents that should be considered in connection with this exhibit. Petitioner also objects to this exhibit under FRE 401-402 (relevance). To the extent Patent Owner relies on this document for the truth of the matter asserted, Petitioner objects to this exhibit as inadmissible hearsay under FRE 801 and 802 not falling under any exceptions, including those of FRE 803, 804, 805, or 807.

**Exhibits 2013-2014**

Petitioner objects to these exhibits as not properly authenticated under FRE 901 because Patent Owner has not presented sufficient evidence to show that they are authentic or self-authenticating under FRE 902. Petitioner further objects to these exhibits under FRE 106 (completeness), as these exhibits are incomplete and only include select portions of larger documents or collections of documents that should be considered in connection with these exhibits. To the extent Patent Owner relies on these documents for the truth of the matter asserted, Petitioner objects to these exhibits as inadmissible hearsay under FRE 801 and 802 not falling under any exceptions, including those of FRE 803, 804, 805, or 807.

**Exhibit 2015**

Petitioner objects to this exhibit as not properly authenticated under FRE 901 because Patent Owner has not presented sufficient evidence to show that it is authentic or self-authenticating under FRE 902. To the extent Patent Owner relies on this document for the truth of the matter asserted, Petitioner objects to this exhibit as inadmissible hearsay under FRE 801 and 802 not falling under any exceptions, including those of FRE 803, 804, 805, or 807.

**Exhibits 2016 & 2018**

Petitioner objects to these exhibits as improper lay testimony under FRE 701, to the extent they offer testimony in the form of an opinion that is based on scientific, technical, or other specialized knowledge within the scope of FRE 702. Petitioner

further objects to these exhibits for lack of foundation and lack of personal knowledge under FRE 602, and as inadmissible hearsay under FRE 801 and 802 not falling under any exceptions, including those of FRE 803, 804, 805, or 807.

Respectfully submitted,

Dated: May 25, 2023

By: / Lisa K. Nguyen /

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