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UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC., )  
)  
Petitioner, )  
)  
VS. ) CASE NO.  
) IPR2023-00059  
ANGEL TECHNOLOGIES GROUP, LLC, )  
)  
Patent Owner. ) Volume I  
\_\_\_\_\_ ) Pages 1 through 209

REMOTE DEPOSITION OF DR. ELI SABER  
OCTOBER 20, 2023

--ooOoo--

JOB NO.: 6131895  
REPORTED BY: MICHELLE MEDEL SABADO, RPR, CRR, CSR #7423



1                    REMOTE DEPOSITION OF DR. ELI SABER, TAKEN ON  
2 BEHALF OF PETITIONER, COMMENCING AT 9:01 A.M. EDT,  
3 FRIDAY, OCTOBER 20, 2023, AT WEBSTER, NEW YORK, BEFORE  
4 MICHELLE MEDEL SABADO, RPR, CRR, CSR #7423.

5  
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7  
8 APPEARANCES OF COUNSEL:  
9 (ALL PARTIES APPEARING REMOTELY)

10  
11 FOR PETITIONER:

12                    ALLEN & OVERY, LLP  
13                    BY: ALAN M. BILLHARZ, ESQ.  
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25 Also Present:

SCOTT W. HEJNY - MCKOOL SMITH, P.C.  
EVAN WAINWRIGHT - ALLEN & OVERY, LLP

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I N D E X

WITNESS	EXAMINATION BY	PAGE
DR. ELI SABER	(BY MR. BILLHARZ)	4

E X H I B I T S

NUMBER	PAGE	DESCRIPTION
EXHIBIT A	61	RIT BULLETIN 1999-00
EXHIBIT B	82	RIT BULLETIN 2003
EXHIBIT C	94	DOCUMENT 39
EXHIBIT D	104	DOCUMENT 36

1 WEBSTER, NEW YORK

2 Friday, October 20, 2023; 9:01 a.m. Edt

3  
4  
5 ELI SABER,

6 having been first duly sworn by the Reporter, was  
7 examined and testified as follows:

8  
9 EXAMINATION

10 BY MR. BILLHARZ:

11 Q Good morning, Dr. Saber.

12 A Good morning.

13 Q You understand that you're testifying under  
14 oath today?

15 A I do.

16 Q And is there any reason you cannot provide  
17 full, complete and truthful testimony today?

18 A No, there is not.

19 Q Okay. Is there anyone in the room with you  
20 besides counsel of record?

21 A No.

22 Q Or is there anyone in the room with you at  
23 all?

24 A No.

25 Q Now I understand this is not your first

Page 4

1 deposition; is that correct?

2 A That is correct.

3 Q According to your CV, you've been deposed 11  
4 times before; is that right?

5 A Twelve times.

6 Q Twelve times.

7 A Yes. So I probably -- I probably should  
8 update my CV.

9 Q Understood.

10 Does that make this lucky number 13?

11 A I would hope so.

12 Q Well, given your experience with depositions,  
13 I won't belabor the rules but we'll just cover some  
14 basics. Is that okay?

15 A I think it's excellent to review the rules.

16 Q Okay. So first, if I ask a question that you  
17 do not understand, please let me know and I'll try to  
18 correct or clarify the question. If you answer, I'll  
19 presume that you understood my question. Is that fair?

20 A That's fair.

21 Q Okay. And to help our court reporter, would  
22 you please answer my questions verbally, no head nods or  
23 gestures?

24 A I will.

25 Q Okay. And let's also try not to talk over

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