

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC. AND
SAMSUNG ELECTRONICS CO., LTD.,
Petitioners,

v.

GAEA, LLC,
Patent Owner.

Case IPR2026-00427
Patent 12,265,715

**NOTICE OF INTENT TO DESIGNATE CLIFF WIN, JR.
A PROVISIONALLY RECOGNIZED PATENT TRIAL AND APPEAL
BOARD ATTORNEY, AS BACK-UP COUNSEL**

EXHIBIT LIST

Exhibit No.	Exhibit Description
2001	US 2017/0075909 (Goodson)
2002	US 2021/0182190 (Gao)
2003	Director Vidal's June 21, 2022 Memorandum
2004	March 24, 2025 memorandum by Chief APJ Boalick
2005	July 29, 2026 Gaea's Preliminary Infringement Contentions Against Meta
2006	September 11, 2026 Meta's Invalidity Contentions
2007	July 6, 2026 Gaea's Preliminary Infringement Contentions Against Samsung
2008	August 31, 2026 Samsung's Invalidity Contentions
2009	August 31, 2026 Samsung's Subject Matter Ineligibility Contentions
2010	Ex. C to 7-29-2026 Gaea's Preliminary Infringement Contentions Against Meta
2011	Ex. C to 7-6-2026 Gaea's Preliminary Infringement Contentions Against Samsung
2012	Mar. 26, 2025 Stewart Memorandum InterimProcesses-PTABWorkloadMgmt
2013	April 1, 2025 Director's CSIS Statement
2014	04-08-2024 Information Disclosure Statement, citing U.S. Pat. Pub. No. 2004/0174627
2015	8-21-2024 List of References Cited by Applicant and Considered by Examiner, citing U.S. Pat. Pub. No. 2004/0174627
2016	Declaration of Cliff Win, Jr., In Support of Notice of Intent

Pursuant to 37 C.F.R. § 42.10(c)(2)(ii), Patent Owner Gaea, LLC hereby submits this Notice of Intent to Designate Cliff Win, Jr., a Provisionally Recognized PTAB Attorney, as Back-Up Counsel.

Registered practitioner C. Maclain Wells, Reg. No. 48,991 is serving as Lead Counsel for Patent Owner in this proceeding. *See* Paper 6. The most recent proceeding in which Mr. Win was recognized *pro hac vice* by order of the Board, pursuant to a motion of the type described in 37 C.F.R. § 42.10(c)(1), was IPR2024-00556 (Paper 9, June 14, 2024).

Filed herewith is a certification in the form of a declaration in which Mr. Win attests to satisfying all requirements set forth by the Board for *pro hac vice* recognition of a provisionally recognized PTAB attorney. *See* Ex. 2016. A power of attorney from the Patent Owner appointing Mr. Win was previously filed in this proceeding on August 14, 2026. *See* Paper 7.

Respectfully Submitted,

Dated: October 13, 2026, 2026

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(Case No. IPR2026-00427)

Attorneys for Patent Owner

CERTIFICATE OF SERVICE

As authorized by Patent Owner's Mandatory Notice, I hereby certify that on October 13, 2026, a copy of this document has been served in its entirety by electronic mail on Petitioner's lead and backup counsel.

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Dated: October 13, 2026, 2026

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