

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

3 LKQ CORPORATION and KEYSTONE AUTOMOTIVE INDUSTRIES, INC.,
4 Petitioners,

5 v.

6 GM GLOBAL TECHNOLOGY OPERATIONS, LLC
7 Patent Owner.

8
9 IPR 2020-00534

U.S. Design Patent Owner No. D797-625

10
11
12 Remotely held videotaped deposition of
13 THOMAS V. PETERS taken before CAROL CONNOLLY, CSR, CRR,
14 and Notary Public, pursuant to the Federal Rules of Civil
15 Procedure for the United States District Courts
16 pertaining to the taking of depositions, at commencing at
17 9:00 a.m. on the 1st day of December, A.D., 2020.

18
19
20
21
22
23
24
25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

REMOTELY HELD VIDEOTAPED DEPOSITION OF THOMAS V. PETERS
TAKEN December 1, 2020

EXAMINATION BY		PAGE
Mr. Irwin		4

- - - - -

EXHIBITS MARKED

		PAGE
Exhibit 1001	U.S. Patent No. D797,625	66
Exhibit 1006	U.S. Patent No. D773,340	82
Exhibit 1041	IPR2020-00534-Lian Pictures (Collage)	129
Exhibit 1042	IPR2020-00534-Lian Pictures (Collage)	130

1 THE VIDEOGRAPHER: Good morning. Today's date is
2 December 1st, 2020. We are on the record at 9:00 a.m.
3 Today we'll take a videotaped deposition of Thomas
4 Peters. This deposition is being held remotely.

5 Would you please swear the witness.

6 THOMAS PETERS,
7 called as a witness herein, having been first duly sworn,
8 was examined upon oral interrogatories and testified as
9 follows:

10 EXAMINATION

11 By Mr. Irwin:

12 Q Mr. Peters, could you state your full name for
13 the record, please.

14 A Yes. My name is Thomas Van Kirk Peters.

15 Q And, Mr. Peters, again your home address?

16 A It's 1957 Cragin Drive, Bloomfield Hills,
17 Michigan.

18 Q And you and I met. This is the second time
19 that I've deposed you, correct?

20 A That's correct.

21 Q I've deposed you in another proceeding
22 involving the validity of one of GM's patents, correct?

23 A Correct.

24 Q Now I sent you -- like I did last time, I sent
25 you a binder again. Did you get that binder?

1 A Yes.

2 Q Have you opened it, the box?

3 A Yes, yes.

4 Q Okay. Could you please pull the binder out so
5 we can step through what's in there, make sure it's
6 clear.

7 By the way, Joe, Mr. Herriges, I've also made
8 what I sent him available on Exhibit Share, and the
9 binder includes what was populated on Exhibit Share.
10 Okay?

11 MR. HERRIGES: Okay.

12 MR. IRWIN: Q So, Mr. Peters, if you have the
13 binder, just -- there should be a table of contents in
14 the front.

15 A Yes.

16 Q And there's four numbered tabs, 1 through 4,
17 and behind Tab 1 is the patent at issue, the '625 patent,
18 correct?

19 A Okay. Yes.

20 Q And behind Tab 2 is the primary prior art
21 reference, what we will refer to as the Lian reference,
22 correct?

23 A Yes.

24 Q And behind Tab 3 is the -- what we'll refer to
25 as the Tucson reference.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.