

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

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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.

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1 There were present at the taking of this
2 deposition the following counsel:

3 IRWIN IP, LLC by
4 MR. BARRY F. IRWIN (via Zoom)
5 222 South Riverside Plaza
6 Suite 2350
7 Chicago, Illinois 60606
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 appeared on behalf of the Petitioner;

10 FISH & RICHARDSON, P.C. by
11 MR. JOSEPH HERRIGES (via Zoom)
12 3200 RBC Plaza
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 appeared on behalf of the Patent Owner.

17 ALSO PRESENT:

18 Ms. Angela Caligiuri
19 Mr. Justin Bond, Videographer
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REMOTELY HELD VIDEOTAPED DEPOSITION OF THOMAS V. PETERS
TAKEN December 1, 2020

EXAMINATION BY		PAGE
Mr. Irwin		4

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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.

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