

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

THALES VISONIX, INC.
Patent Owner

Case IPR2022-01304
Patent 6,922,632

**DECLARATION OF AKSHAY S. DEORAS IN SUPPORT OF
UNOPPOSED MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF
PETITIONER**

META 1032
IPR2022-01304

I, Akshay S. Deoras, do hereby declare:

1. I am a partner in the law firm Kirkland & Ellis LLP. Lead counsel in this *Inter Partes* review proceeding is W. Todd Baker, who is also a partner with the law firm Kirkland & Ellis LLP and is registered to practice before the United States Patent and Trademark Office under Registration No. 45,265. With respect to this proceeding, I will work closely with Mr. Baker.
2. I hold Bachelor of Science degree in Electrical Engineering from Columbia University. I hold a Juris Doctor degree from the Columbia University School of Law.
3. I have more than 14 years of experience as a litigation attorney who specializes in patent litigation and represents clients in patent litigation matters in various United States District Courts, the Court of Appeals for the Federal Circuit, and before the International Trade Commission. My experience includes many matters in the electrical and computer science arts, and I have particular experience relevant to the technological and legal matters at issue in this proceeding. I am, therefore, an experienced patent litigation attorney with particular expertise that is pertinent to this proceeding. Meta Platforms, Inc. (“Meta”) desires, and has a need, to be represented in certain

aspects of these proceedings by an experienced patent litigation attorney who has particular expertise that is relevant to the issues in this proceeding.

5. I am very familiar with U.S. Patent No. 6,922,632 and with the legal subject matter, technical subject matter, and prior art discussed in Petitioner's Request for *Inter Partes* Review of U.S. Patent No. 6,922,632 which forms the basis for this proceeding. I am currently counsel to Meta in the co-pending litigation relating to the same patent (Gentex Corporation et al. v Meta Platforms, Inc. et al., Case No. 4:22-cv-03892-YGR (N.D. Cal.) and am involved with factual and technical developments in that matter.
6. I am a member in good standing of the Bar of the State of California and the State of New York. He is admitted to practice before the U.S. District Court for the Northern District of California and the U.S. Court of Appeals for the Federal Circuit.
7. I have never been suspended or disbarred from practice before any court or administrative body.
8. I have never had a court or administrative body deny my application for admission to practice.

9. I have never been sanctioned or cited for contempt by any court or administrative body.
10. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of 37 C.F.R.
11. I agree to be subject to the United States Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).
12. In the past 3 years, I was admitted *pro hac vice* as counsel for before the PTAB in the following actions:
- *Inter Partes* Review IPR2020-01579, IPR2020-01583, and IPR2020-01585 as counsel for Apcon, Inc.
 - *Inter Partes* Review IPR2020-001517, IPR2020-001518, IPR2020-001612, IPR2020-001613, and IPR2021-00187 as counsel for Omnitrac, LLC
 - *Inter Partes* Review IPR2021-00323, IPR2021-00324, and IPR2021-00325 as counsel for XRS Corporation
13. I declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful, false statements and the like so made are punishable by fine or imprisonment, or

both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of U.S. Patent No. 6,922,632.

Date: April 11, 2023

Respectfully submitted,

/Akshay S. Deoras/

Akshay S. Deoras
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: 415-439-1400
Facsimile: 415-439-1500
akshay.deoras@kirkland.com