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

-----)
META PLATFORMS, INC.)
Petitioner,) IPR NO.
vs.) 2022-01304
THALES VISONIX, INC.,)
Patent Owner.)
-----)

DEPOSITION OF YOHAN BAILLOT
WASHINGTON, D.C.
SEPTEMBER 13, 2023

REPORTED BY: Tina Alfaro, RPR, CRR, RMR



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Deposition of YOHAN BAILLOT, held at the
offices of:

Williams & Connolly, LLP
680 Maine Avenue, SW
Washington, D.C.

Taken pursuant to notice before Tina M.
Alfaro, a Notary Public within and for the District
of Columbia.

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APPEARANCES :

ON BEHALF OF THE PETITIONER :

KIRKLAND & ELLIS , LLP

BY: JOSHUA GLUCOFT , ESQ .

2049 Century Park East

Los Angeles , CA 90067

ON BEHALF OF THE PATENT OWNER :

WILLIAMS & CONNOLLY , LLP

BY: MELISSA COLLINS , ESQ .

SHAYON GHOSH , ESQ .

680 Maine Avenue , SW

Washington , D.C. 20024

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I N D E X
EXAMINATION

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PREVIOUSLY MARKED EXHIBITS

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(Witness sworn.)

WHEREUPON:

YOHAN BAILLOT,

called as a witness herein, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. GLUCOFT:

Q. Mr. Baillot, are you familiar with Kalman filters?

A. I am.

Q. Do you agree that a Kalman filter used for tracking must be configured properly to accept a type and format of data produced by a sensor that feeds into it?

A. I agree to that, yeah.

Q. Do you agree that Kalman filters are configured according to the calibration parameters that it uses?

A. I would say that's not the only thing. It might vary between different Kalman filter type. You need to have -- a bit more specific.

Q. Do you agree that Kalman filters are

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