

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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META PLATFORMS, INC.,  
Petitioner

v.

THALES VISIONIX, INC.,  
Patent Owner

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U.S. PATENT NO. 6,757,068  
U.S. PATENT NO. 6,922,632  
U.S. PATENT NO. 7,725,253  
U.S. PATENT NO. 7,301,648  
U.S. PATENT NO. 8,224,024

IPR2022-01294; IPR2022-01298; IPR2022-01301; IPR2022-01302;  
IPR2022-01303; IPR2022-01304; IPR2022-01305; IPR2022-01308

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**DECLARATION OF GLEN PARKER**

I, Glen Parker, am more than twenty-one years of age, am competent to present this declaration, have personal knowledge of the facts set forth herein, and hereby declare as follows:

1. I am Chief Operating Officer of Thales Defense & Security Inc., which is the owner by merger of Thales Visionix, Inc. (“Thales”).

2. I understand that on May 23, 2023, Dr. Ulrich Neumann, an expert witness for Petitioner Meta Platform’s Inc., was questioned at deposition by David M. Krinsky of the law firm Williams & Connolly LLP, counsel for Real-Party-in-Interest Gentex Corp. (“Gentex”). Attorneys who, at that time, were counsel of record for Thales attended the deposition remotely, with the expectation that Mr. Krinsky would conduct the questioning. I understand that Mr. Krinsky traveled from the Washington, DC area to San Francisco to take the deposition in person.

3. I further understand that also on May 23, 2023, Petitioner’s counsel raised for the first time at the outset of that deposition an objection to Gentex’s counsel asking questions on behalf of Gentex and Thales.

4. Thales consented to Mr. Krinsky’s questioning Dr. Neumann on behalf of both Thales and Gentex. No other attorney for Thales or Gentex asked (or came prepared to ask) any questions. Thales’s expectation was that Mr. Krinsky would be the sole questioner on Patent Owner’s side, which is what in

fact transpired after Petitioner's counsel noted Petitioner's objection but then stated that the deposition could proceed.

5. I further understand that, after counsel for Petitioner raised its objection with the Patent Trial and Appeals Board on May 26, 2023, the Board informed the parties on May 31, 2023 that "only counsel for which Patent Owner has filed a power of attorney (and subsequent mandatory notices) may ask questions of Petitioner's expert in a deposition."

6. After learning of the Board's May 31 decision, I promptly executed updated Powers of Attorney in IPR Proceeding Nos. IPR2022-01294, IPR2022-01298, IPR2022-01301, IPR2022-01302, IPR2022-01303, IPR2022-01304, IPR2022-01305, and IPR2022-01308 appointing David M. Krinsky, D. Shayon Ghosh, Arthur J. Argall III, Adam D. Harber, and Melissa Collins from Williams & Connolly LLP as attorneys authorized to transact business on behalf of Thales in the above-named proceedings. The updated Powers of Attorney were filed in each proceeding on May 31, 2023.

7. Depositions in IPR Nos. IPR2022-01298, IPR2022-01301, IPR2022-01302, IPR2022-01303, IPR2022-01304, IPR2022-01305, and IPR2022-01308 were subsequently conducted by Williams & Connolly LLP attorneys, just like the May 23 deposition by Mr. Krinsky, without objection by Petitioner.


8. If Petitioner had timely raised its objection in advance of the May 23, 2023 deposition of Dr. Neumann, allowing the Board to provide guidance to the parties, I would have executed the updated Powers of Attorney appointing the above-named Williams & Connolly LLP attorneys as attorneys authorized to act on behalf of Thales at an earlier date, in advance of the May 23, 2023 deposition. I did not do so only because Meta did not make its objection known in time.

9. Thales adopts the testimony taken in the May 23, 2023 deposition pursuant to questioning by Mr. Krinsky as if it were taken by Thales's own attorneys.

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I hereby 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 are punishable by fine or imprisonment, or both, under Section 1001 of Title 18, United States Code and may jeopardize the validity of any application or any patent issuing thereon.

Executed on: 29 June, 2023

By:   
Glen Parker