

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

3 -----x  
4 META PLATFORMS, INC.,  
5 Petitioner,  
6 vs.  
7 THALES VISIONIX, INC.,  
8 Patent Owner.  
-----x

9 U.S. PATENT NO. 8,224,024  
10 IPR2022-01294  
-----x

11 U.S. PATENT NO. 6,757,068  
12 IPR2022-01302 and IPR2022-01303  
-----x

13 U.S. PATENT NO. 6,922,632  
14 IPR2022-01304 and IPR202201305  
-----x

15 U.S. PATENT NO. 7,301,648  
16 IPR2022-01298 and IPR2022-10301  
-----x

17 U.S. PATENT NO. 7,725,253  
18 IPR2022-01308  
-----x

19 REMOTE DEPOSITION BY VIRTUAL ZOOM OF  
20 GLEN PARKER, JR.  
21 Tuesday, October 24, 2023  
22

23 Stenographically Reported By:  
24 Lynne Ledanois, License No. 6811  
25 Job No. 6144112

<p>1 UNITED STATES PATENT AND TRADEMARK OFFICE  2 BEFORE THE PATENT TRIAL AND APPEAL BOARD  3 -----X  4 META PLATFORMS, INC.,  5 Petitioner,  6 vs.  7 THALES VISIONIX, INC.,  8 Patent Owner.  9 -----X  9 U.S. PATENT NO. 8,224,024  10 IPR2022-01294  11 -----X  11 U.S. PATENT NO. 6,757,068  12 IPR2022-01302 and IPR2022-01303  13 -----X  13 U.S. PATENT NO. 6,922,632  14 IPR2022-01304 and IPR202201305  15 -----X  15 U.S. PATENT NO. 7,301,648  16 IPR2022-01298 and IPR2022-10301  17 -----X  17 U.S. PATENT NO. 7,725,253  18 IPR2022-01308  19 -----X  19  20  21 Deposition of GLEN PARKER, taken in  22 Washington, DC commencing at 8:04 a.m., on Tuesday,  23 October 24, 2023 before LYNNE M. LEDANOIS, Certified  24 Shorthand Reporter No. 6811  25 * * *</p> <p style="text-align: right;">Page 2</p>	<p>1 REMOTE APPEARANCES  2  3 Counsel for Real Party-In-Interest Gentex Corp.:  4 WILLIAMS &amp; CONNOLLY LLP  5 BY: ADAM HARBER  6 Attorney at Law  7 680 Maine Avenue SW  8 Washington, DC 20024  9 aharber@wc.com  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 4</p>
<p>1 REMOTE APPEARANCES  2  3 Counsel for Petitioner Meta Platforms, Inc.:  4 KIRKLAND &amp; ELLIS LLP  5 BY: YAN-XIN LI  6 W. TODD BAKER (Washington, DC)  7 Attorneys at Law  8 555 Flower Street  9 Suite 3700  10 Los Angeles, California 90071  11 yanxin.li@kirkland.com  12 todd.baker@kirkland.com  13  14 Counsel for Patent Owner Thales Visionix, Inc.:  15 ADDYHART PC  16 BY: BRANDON HELMS  17 MEREDITH MARTIN ADDY  18 Attorney at Law  19 401 N. Michigan Avenue  20 Suite 1200-1  21 Chicago, Illinois 60611  22 bhelms@addyhart.com  23 maddy@addyhart.com  24  25 ///</p> <p style="text-align: right;">Page 3</p>	<p>1 INDEX OF EXAMINATION  2  3 Examination by: Page  4 Ms. Li 7, 57  5 Mr. Helms 55  6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: right;">Page 5</p>

<p>1 INDEX OF EXHIBITS  2 Deposition Description Page  3 Exhibit A Declaration of Glen Parker, 12  4 6/29/23;  5  6  7  8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25 ///</p> <p style="text-align: right;">Page 6</p>	<p>1 we were struggling with some audio issues earlier.  2 A I can hear you okay. I cannot confirm if  3 you can hear me okay, though.  4 Q I can confirm I can hear you okay.  5 A All right.  6 Q I want to confirm, do you have access to  7 Exhibit Share in the event that we look at some  8 documents today?  9 A Yes, I will be provided access.  10 MS. LI: Okay. I just want to confirm  11 that it's up and running in front of Mr. Parker.  12 What I've actually done is just mark an  13 exhibit and so I wanted to make sure that you were  14 all able to see the exhibit that's currently in the  15 marked exhibits folder.  16 MR. HARBER: It's in there. He also has a  17 hard copy of that exhibit in front of him.  18 MS. LI: Great. Thank you.  19 Q Mr. Parker, do you have any other programs  20 running on your computer besides the Exhibit Share  21 and besides this Zoom meeting?  22 A Just it looks like Outlook.  23 MR. HELMS: Just for the record, it's not  24 his computer, it's a computer provided by Williams &amp;  25 Connolly.</p> <p style="text-align: right;">Page 8</p>
<p>1 Tuesday, October 24, 2023  2 8:04 a.m.  3 -----  4 MS. LI: For the record, this is Yan-Xin  5 Li on behalf of petitioner Meta Platforms from  6 Kirkland &amp; Ellis. With me is also Todd Baker of  7 Kirkland &amp; Ellis.  8 MR. HELMS: This is Brandon Helms. Also  9 with me is Adam Harber from Williams &amp; Connolly on  10 behalf of patent owner.  11 Basically what we understand Meta to be  12 asking today, we expect there will be privilege  13 issues. We'll try to deal with those as we go  14 question by question, but we're here to proceed.  15 GLEN PARKER, JR.  16 having been duly sworn, testified as follows:  17 EXAMINATION  18 BY MS. LI:  19 Q Mr. Parker, could you please state your  20 full name for the record?  21 A Glen Eyrie Parker, Junior.  22 Q And where are you presently located?  23 A Washington D.C.  24 Q And I just want to confirm that you can  25 hear me okay and that I can hear you okay. I know</p> <p style="text-align: right;">Page 7</p>	<p>1 MS. LI: Understood.  2 Q I guess to the extent that you have  3 control, I want to make sure that all other programs  4 besides Exhibit Share and this Zoom link are  5 minimized so as not to provide any distractions. Is  6 that fair?  7 A They are all minimized.  8 Q Also, if you could, if you have not  9 already, put your phone on silence or do not disturb  10 so there is no distractions during this deposition,  11 that would be great.  12 A Done.  13 Q Thank you.  14 Mr. Parker, have you been deposed before?  15 A Yes.  16 Q How many times?  17 A Once.  18 Q Are you able for describe the context or  19 the subject matter of that prior deposition?  20 MR. HELMS: I would advise you not to  21 reveal any confidential or privileged information.  22 THE WITNESS: It was regarding design of  23 an RF power amplifier.  24 BY MS. LI:  25 Q And when was that deposition?</p> <p style="text-align: right;">Page 9</p>

1 A Probably 15 years ago.  
2 Q Safe to say that that case is not ongoing?  
3 A I don't think the company exists anymore.  
4 Q Understood.  
5 I would like to go over some deposition  
6 basics. Since we're taking this remotely, I want to  
7 make sure there is a clear record for the court  
8 reporter.  
9 So I'll make every effort to make sure  
10 that I do not speak over you. Could you likewise  
11 please make sure that we don't interrupt each other  
12 or talk over each other?  
13 A I'll do my best.  
14 Q And also, since this is a remote  
15 deposition, it's important that your answers be  
16 audible and verbal.  
17 So no head shakes or nods, no hand  
18 gestures, no mm-hmm; is that fair?  
19 A Like the verbal yes when you're sitting in  
20 the fire escape seat in the plane, yes.  
21 Q Thank you.  
22 I will do my best to ask understandable  
23 questions. If there is anything you do not  
24 understand in a question that I ask you during the  
25 course of this deposition, will you please let me

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1 know?  
2 A Yes.  
3 Q And if you do answer my question, I will  
4 assume that you understood that question; is that  
5 fair?  
6 A Yes.  
7 Q And you mentioned that you're currently  
8 sitting in Washington D.C.  
9 Can you just confirm who else is in the  
10 room with you?  
11 A Brandon Helms and Adam Harber.  
12 Q Anyone else?  
13 A No.  
14 Q Also, because we are a not in person, will  
15 you agree that you won't have communications with  
16 your attorneys to the side off of the Zoom video  
17 when we're on the record?  
18 A Yes.  
19 Q I would also ask if you would refrain from  
20 talking about the substance of your deposition until  
21 we finish with your attorneys.  
22 A Okay.  
23 MR. HELMS: With the caveat, as I  
24 mentioned, we may have privilege issues that come up  
25 and we might need to discuss those during the

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1 deposition.  
2 MS. LI: Understood.  
3 Q I don't think anybody is expecting this  
4 deposition to take the remainder of the day, but,  
5 Mr. Parker, if you need a break, will you please let  
6 me know?  
7 A Yes.  
8 Q My only ask is if there is a pending  
9 question, that you answer the question before we  
10 take a break; is that fair?  
11 A Yes.  
12 Q Is there anything that would prevent you  
13 from providing full, truthful and accurate testimony  
14 today?  
15 A No.  
16 Q Great. If you could please look in  
17 Exhibit Share, or maybe if you have a paper copy in  
18 front of you, could you let me know if you see  
19 something called Exhibit A-Exhibit 2023 Declaration  
20 of Glen Parker?  
21 A I see Exhibit 2023. I don't see it defined  
22 as Exhibit A, but it is the declaration of Glen  
23 Parker.  
24 (Whereupon, Exhibit A was marked for  
25 identification.)

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1 BY MS. LI:  
2 Q I think periodically you might have to  
3 refresh Exhibit Share if your attorneys have not  
4 provided a paper copy for you. I just wanted to  
5 make that clear because it's not always --  
6 A I have a paper copy of the declaration of  
7 Glen Parker.  
8 Q Great. If you go to Page 4, which is  
9 premarked Exhibit 2023, is that your signature at  
10 the bottom on the right?  
11 A Yes.  
12 Q And did you sign this declaration on  
13 June 29th, 2023?  
14 A Yes.  
15 Q Could you please turn to Page 2 of this  
16 declaration.  
17 If you look at Paragraph 1, you note that  
18 you are the chief operating officer of Thales  
19 Defense & Security Inc.  
20 Do you see that?  
21 A Yes.  
22 Q Is your current job title still chief  
23 operating officer of Thales Defense & Security Inc.?  
24 A Yes.  
25 Q And what does your role as chief operating

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<p>1 officer generally entail?</p> <p>2 A As COO, I'm responsible for our production</p> <p>3 facility and production staff. I bear responsibility</p> <p>4 for program management, contracts and legal, trade</p> <p>5 compliance, field support and our customer service</p> <p>6 department.</p> <p>7 Q And when did you become chief operating</p> <p>8 officer of Thales Defense &amp; Security Inc.?</p> <p>9 A Three years ago. I'm not positive.</p> <p>10 Q And before your role as chief operating</p> <p>11 officer of Thales Defense &amp; Security Inc., what</p> <p>12 previous job titles and responsibilities did you</p> <p>13 have at Thales Defense &amp; Security Inc.?</p> <p>14 A Well, I've been there for over 30 years. I</p> <p>15 started as a program manager and moved to vice</p> <p>16 president of program management, took on contracts,</p> <p>17 legal and trade compliance and then gained the</p> <p>18 production aspects as well and became COO.</p> <p>19 Q Have you held any positions with Thales</p> <p>20 Visionix Inc.?</p> <p>21 A They are within my realm of responsibility,</p> <p>22 though I've never held a position within TVI.</p> <p>23 Q Have you held any positions with any other</p> <p>24 Thales entities such as Thales Communications?</p> <p>25 A Thales Communications was renamed as TDSI,</p> <p style="text-align: right;">Page 14</p>	<p>1 merger of Thales Visionix Inc.</p> <p>2 When did that merger take place?</p> <p>3 A We bought Visionix over ten years ago. The</p> <p>4 merge of the two legal entities occurred four or five</p> <p>5 years ago.</p> <p>6 I'm working from memory and it can be</p> <p>7 faulty at times.</p> <p>8 Q I think you already answered my question,</p> <p>9 which was what entities were involved in the merger.</p> <p>10 And from what I understand, it was Thales</p> <p>11 Defense &amp; Security Inc. and TVI, which I'm going to</p> <p>12 start using instead of saying Thales Visionix Inc.</p> <p>13 Is that fair?</p> <p>14 A Yeah. And I would recommend TDSI instead of</p> <p>15 Thales Defense &amp; Security to save the syllables as</p> <p>16 well.</p> <p>17 Q Thank you. I will go ahead and start</p> <p>18 doing that.</p> <p>19 Were you yourself involved in the merger?</p> <p>20 A Well, I want to break it in two. There was</p> <p>21 the acquisition and then the merger of the legal</p> <p>22 entities.</p> <p>23 TDSI fully owned TVI and at a later date,</p> <p>24 they were merged into us.</p> <p>25 I was not involved in the acquisition. I</p> <p style="text-align: right;">Page 16</p>
<p>1 so yes.</p> <p>2 Q Anything else or any other Thales entities</p> <p>3 in your long history of employment with Thales?</p> <p>4 A I started with Racal Communications, which</p> <p>5 was purchased by Thomson at the time and then renamed</p> <p>6 Thales. That was back in 2000.</p> <p>7 Q Any other entities?</p> <p>8 A No.</p> <p>9 Q So you mentioned that you also work with</p> <p>10 respect to contracts.</p> <p>11 Have you executed contracts on behalf of</p> <p>12 Thales Defense &amp; Security Inc.?</p> <p>13 A No.</p> <p>14 Q Have you executed contracts on behalf of</p> <p>15 Thales Visionix Inc.?</p> <p>16 A No.</p> <p>17 Q When you described that you worked with</p> <p>18 respect to contracts, what -- what kind of work have</p> <p>19 you done with respect to contracts in your current</p> <p>20 role as COO?</p> <p>21 A I managed the department. I don't perform</p> <p>22 as a contracts manager.</p> <p>23 Q Understood. If I go back to your</p> <p>24 declaration in Paragraph 1, you also note that</p> <p>25 Thales Defense &amp; Security Inc. is the owner by</p> <p style="text-align: right;">Page 15</p>	<p>1 was peripherally involved in the merge.</p> <p>2 Q Can you describe a little bit further</p> <p>3 about what your involvement was with the merger?</p> <p>4 A With the merger as legal -- as I bear</p> <p>5 responsibility for legal, my role was, I would say, to</p> <p>6 support and supervise but no actual activity.</p> <p>7 Q And as of today, is TVI still an entity</p> <p>8 that's within TDSI?</p> <p>9 A Yes. It is a business line within our</p> <p>10 business structure.</p> <p>11 Q Are you familiar with a company called</p> <p>12 InterSense?</p> <p>13 A I am.</p> <p>14 Q What is InterSense?</p> <p>15 A InterSense was -- again, this is from some</p> <p>16 period of time ago. But InterSense was an</p> <p>17 organization that was, for lack of a better defined</p> <p>18 term, merged with Visionix and I believe was bought by</p> <p>19 Gentex.</p> <p>20 MR. HELMS: For the record, object to</p> <p>21 relevance of the last question and scope of your</p> <p>22 questions that have been posed so far.</p> <p>23 MR. HARBER: For the record, I think if we</p> <p>24 are going to continue, unless there is some</p> <p>25 connection to what's in the declaration, that's the</p> <p style="text-align: right;">Page 17</p>

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