

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.
Petitioner

v.

THALES VISIONIX, INC.
Patent Owner

U.S. PATENT NO. 6,922,632

IPR2022-01305

**DECLARATION OF MELISSA B. COLLINS IN SUPPORT OF
UNOPPOSED MOTION FOR PRO HAC VICE ADMISSION
PURSUANT TO 37 C.F.R. § 42.10(c)**

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I, Melissa B. Collins, 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. This declaration is given in support of Real Party-in-Interest Gentex Corporation's Motion for Admission *pro hac vice*.

2. I am a partner at Williams & Connolly LLP, 680 Maine Avenue SW, Washington, DC 20024. I have more than ten years of litigation experience.

3. I am a member in good standing of the bars of New York and the District of Columbia.

4. I have never been suspended or disbarred from practice before any court or administrative body.

5. No court or administrative body has ever denied my application for admission to practice before it.

6. No court or administrative body has ever imposed sanctions or contempt citations on me.

7. 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.

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8. I understand that I will be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 et seq. and will be subject to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

9. I have not been admitted to appear *pro hac vice* before the Board in the last three years.

10. I am familiar with the subject matter at issue in the present proceeding. This familiarity comes from having:

(i) Served as counsel for Gentex in the co-pending district court litigation, *Gentex Corp. et al. v. Meta Platforms, Inc. et al.*, No. 22-cv-03892-YGR (N.D. Cal.) for over a year since being admitted *pro hac vice* while the case was proceeding in W.D. Texas on February 11, 2022;

(ii) Reviewed in detail the Petition, the exhibits filed by Petitioner in this proceeding, Patent Owner's Preliminary Response, and exhibits filed by Patent Owner in this proceeding;

(iii) Reviewed in detail the challenged patent, U.S. Patent No. 6,922,632;

(iv) Engaged in extensive strategic and substantive discussions regarding this proceeding with Patent Owner's and Real Party-in-Interest Gentex Corporation's counsel—Meredith Martin Addy, Robert P. Hart,

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Gregory B. Gulliver, Brandon C. Helms, D. Shayon Ghosh, and Arthur J. Argall III;

11. I have reviewed in detail relevant case law and other legal authority related to the allegations made in the Petition.

* * *

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: April 21, 2023

By: /Melissa B. Collins/
Melissa B. Collins

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