

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

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.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

I N D E X
EXAMINATION

WITNESS	PAGE
YOHAN BAILLOT	
By Mr. Glucoft	5
By Ms. Collins	214
By Mr. Glucoft	218

PREVIOUSLY MARKED EXHIBITS

DEPOSITION EXHIBITS	PAGE
Exhibit 1001	6
'632 Patent	
Exhibit 1003	209
'253 Patent (Foxlin)	
Exhibit 1007	7
Welch 2001 reference	
Exhibit 1010	128
'132 Patent (Horton)	
Exhibit 2007	8
Expert report	
Exhibit 2011	92
'289 Patent (Harris)	



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

(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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.