

From: [Brandon Helms](#)
To: [Glucoft, Josh](#); [Collins, Melissa](#); [Borrasso, Andrew](#); [Thales Meta IPRs](#); [Gentex-IPR](#); [Meredith Addy](#); [Robert Hart](#); [Greg Gulliver](#); [Ghosh, Shayon](#); [Krinsky, David](#); [Harber, Adam](#); [Argall, Arthur](#); [Brandon Helms](#)
Cc: [#Facebook-Gentex](#); [#Meta-Thales-IPR](#)
Subject: Re: Declaration of Mr. Parker
Date: Sunday, October 1, 2023 10:25:50 AM

This message is from an EXTERNAL SENDER

Be cautious, particularly with links and attachments.

Josh,

Patent Owner Thales Visionix, Inc. confirms that it did not have an attorney-client relationship with any attorney at Williams & Connolly before or during the May 23, 2023 deposition of Dr. Neumann.

As to a date for Mr. Parker's deposition, he is available on October 13. Please let us know if that date works for Meta, and if a 10:00 Eastern start time is acceptable.

Regards,
Brandon

Brandon C. Helms | AddyHart P.C. | [+1 312 731 6568](tel:+13127316568)

From: Glucoft, Josh <josh.glucoft@kirkland.com>

Date: Thursday, September 21, 2023 at 5:02 PM

To: Collins, Melissa <MCollins@wc.com>, Borrasso, Andrew <aborrasso@wc.com>, Thales Meta IPRs <thales-meta-iprs@addyhart.com>, Gentex-IPR <Gentex-IPR@wc.com>, Meredith Addy <meredith@addyhart.com>, Robert Hart <robert@addyhart.com>, Greg Gulliver <gbgulliver@addyhart.com>, Ghosh, Shayon <sghosh@wc.com>, Krinsky, David <DKrinsky@wc.com>, Brandon Helms <bhelms@addyhart.com>, Harber, Adam <AHarber@wc.com>, Argall, Arthur <aargall@wc.com>

Cc: #Facebook-Gentex <Facebook-Gentex@kirkland.com>, #Meta-Thales-IPR <Meta-Thales-IPR@kirkland.com>

Subject: RE: Declaration of Mr. Parker

Melissa,

We still have not received any response from Patent Owner regarding the issues below. Please promptly confirm in writing the position that Patent Owner represented during our confer, provide a date for Mr. Parker's deposition, and let us know the approximate volume of documents that would be produced or withheld under Patent Owner's proposed compromise resolution to our requested document discovery, as I emailed about below.

Regards,
Josh

Josh Glucoft

KIRKLAND & ELLIS LLP

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From: Glucoft, Josh <josh.glucoft@kirkland.com>

Sent: Tuesday, August 22, 2023 5:05 PM

To: Collins, Melissa <MCollins@wc.com>; Borrasso, Andrew <aborrasso@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sgghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>

Cc: #Facebook-Gentex <Facebook-Gentex@kirkland.com>

Subject: RE: Declaration of Mr. Parker

Melissa,

Thank you for meeting and conferring regarding our requested discovery. Please confirm, as your team stated on our call, that Patent Owner (Thales) is not contending, and will not contend, based on Mr. Parker's declaration or otherwise, that there was an attorney-client relationship (express or implied in-fact or by law) between any attorney at Williams & Connolly and Patent Owner at any time before or during the May 23, 2023 deposition of Dr. Neumann.

Regarding Mr. Parker's deposition, we cannot agree in advance to limit the time on record with him but will endeavor in good faith to be time efficient with our questioning. If you would like to have a broader discussion on time limits in apex depositions here and in the litigation, we are willing to discuss that. We can agree to conduct his deposition remotely so that he may appear from his home. Please provide dates in October when Mr. Parker is available for his deposition.

Regarding our requested document discovery, we are still considering your proposal. In order to help us evaluate your proposal, can you please let us know the approximate volume of documents that would be produced, and the approximate volume of documents that would be withheld under a claim of joint defense privilege but not logged?

Regards,
Josh

Josh Glucoft

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From: Glucoft, Josh <josh.glucoft@kirkland.com>
Sent: Wednesday, August 2, 2023 5:13 PM
To: Collins, Melissa <MCollins@wc.com>; Borrasso, Andrew <aborrasso@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>
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Subject: RE: Declaration of Mr. Parker

That works for us, Melissa.

Josh Glucoft

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From: Collins, Melissa <MCollins@wc.com>
Sent: Wednesday, August 2, 2023 9:51 AM
To: Glucoft, Josh <josh.glucoft@kirkland.com>; Borrasso, Andrew <aborrasso@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>
Cc: #Facebook-Gentex <Facebook-Gentex@kirkland.com>
Subject: RE: Declaration of Mr. Parker

Josh,

We can talk at 3:30 ET/ 12:30 PT on Friday. If that works for you, we'll send around an invite.

Melissa

Melissa Collins

Williams & Connolly LLP

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From: Collins, Melissa
Sent: Wednesday, August 2, 2023 10:28 AM

To: 'Glucoft, Josh' <josh.glucoft@kirkland.com>; Borrasso, Andrew <aborrasso@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>

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Subject: RE: Declaration of Mr. Parker

Josh,

We will circle up on our Friday availability and get back to you. In terms of what we'd like to discuss, Thales would like a better understanding of the basis for Meta's position as we evaluate the requests. That will inform our position.

Melissa

Melissa Collins

Williams & Connolly LLP

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From: Glucoft, Josh <josh.glucoft@kirkland.com>

Sent: Wednesday, August 2, 2023 10:23 AM

To: Borrasso, Andrew <aborrasso@wc.com>; Collins, Melissa <MCollins@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>

Cc: #Facebook-Gentex <Facebook-Gentex@kirkland.com>

Subject: RE: Declaration of Mr. Parker

Melissa and Andrew,

We must reschedule today's call. What availability do you have this Friday? Also, please let us know whether Thales opposes the requested discovery and what specifically Thales would like to discuss on the call.

Regards,
Josh

Josh Glucoft

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From: Borrasso, Andrew <aborrasso@wc.com>

Sent: Tuesday, August 1, 2023 2:22 PM

To: Glucoft, Josh <josh.glucoft@kirkland.com>; Collins, Melissa <MCollins@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>

Cc: #Facebook-Gentex <Facebook-Gentex@kirkland.com>

Subject: RE: Declaration of Mr. Parker

Josh,

Please use the dial-in below at 11am Pacific/2pm Eastern.

(332) 249-0718

Phone Conference ID: 403 404 585#

Best,
Andrew

Andrew Borrasso

Associate | Williams & Connolly LLP

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From: Glucoft, Josh <josh.glucoft@kirkland.com>

Sent: Tuesday, August 1, 2023 12:45 PM

To: Collins, Melissa <MCollins@wc.com>; 'Thales Meta IPRs' <thales-meta-iprs@addyhart.com>; Gentex-IPR <Gentex-IPR@wc.com>; 'Meredith Addy' <meredith@addyhart.com>; 'Robert Hart' <robert@addyhart.com>; 'Greg Gulliver' <gbgulliver@addyhart.com>; Ghosh, Shayon <sghosh@wc.com>; Krinsky, David <DKrinsky@wc.com>; 'Brandon Helms' <bhelms@addyhart.com>; Harber, Adam <AHarber@wc.com>; Argall, Arthur <aargall@wc.com>

Cc: #Facebook-Gentex <Facebook-Gentex@kirkland.com>

Subject: RE: Declaration of Mr. Parker

Hi Melissa,

Yes, that slot works. Please circulate a dial-in and let us know what specific time within that

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