

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

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

15 -----x
16 U.S. PATENT NO. 6,922,632
17 IPR2022-01304 and IPR202201305

18 -----x
19 U.S. PATENT NO. 7,301,648
20 IPR2022-01298 and IPR2022-10301

21 -----x
22 U.S. PATENT NO. 7,725,253
23 IPR2022-01308

24 -----x
25 REMOTE DEPOSITION BY VIRTUAL ZOOM OF
GLEN PARKER, JR.
Tuesday, October 24, 2023

Stenographically Reported By:
Lynne Ledanois, License No. 6811
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 10 U.S. PATENT NO. 8,224,024 11 IPR2022-01294 12 -----X 13 U.S. PATENT NO. 6,757,068 14 IPR2022-01302 and IPR2022-01303 15 -----X 16 U.S. PATENT NO. 6,922,632 17 IPR2022-01304 and IPR202201305 18 -----X 19 U.S. PATENT NO. 7,301,648 20 IPR2022-01298 and IPR2022-10301 21 -----X 22 U.S. PATENT NO. 7,725,253 23 IPR2022-01308 24 -----X 25</p> <p>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 & 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 & 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 & 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 & Ellis. With me is also Todd Baker of 7 Kirkland & Ellis. 8 MR. HELMS: This is Brandon Helms. Also 9 with me is Adam Harber from Williams & 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

Page 10

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

Page 11

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.)

Page 12

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

Page 13

<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 & 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 & Security Inc., what</p> <p>12 previous job titles and responsibilities did you</p> <p>13 have at Thales Defense & 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 & 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 & 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 & 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 & 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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