

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. 7,725,253

IPR2022-01308

**JOINT REQUEST TO FILE DOCUMENT
AS BUSINESS CONFIDENTIAL INFORMATION**

Petitioner Meta Platforms, Inc. (“Meta”) and patent owner Thales Visionix, Inc. (collectively, “the Parties”) jointly request to file and treat the Patent License And Settlement Agreement between Petitioner and real party-in-interest Gentex Corporation (the “Meta-Gentex Agreement,” Exhibit 1042) as business confidential information. The Parties further jointly request that the confidential Meta-Gentex Agreement be kept separate from the file of the subject patent in the above-captioned proceeding and be made available only to federal government agencies on written request or to persons showing good cause. The Board authorized the filing of this request on January 16, 2024.

Petitioner considers the Meta-Gentex Agreement as highly sensitive business confidential information that could substantially harm its business interests if publicly disclosed.

Date: January 17, 2024

Respectfully submitted,

/W. Todd Baker/

W. Todd Baker (No. 45,265)
todd.baker@kirkland.com
KIRKLAND & ELLIS LLP
1301 Pennsylvania Ave., N.W.
Washington, D.C. 20004
Telephone: (202) 389-5000
Facsimile: (202) 389-5200

Ellisen Shelton Turner (No. 54,503)
ellisen.turner@kirkland.com
Joshua Popik Glucoft (No. 67,696)

Joint Request to File Confidential Document
IPR2022-01308

josh.glucoft@kirkland.com
KIRKLAND & ELLIS LLP
2049 Century Park East,
Los Angeles, CA 90067
Telephone: (310) 552-4200
Facsimile: (310) 552-5900

Akshay S. Deoras (*pro hac vice*)
akshay.deoras@kirkland.com
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500

Yimeng Dou (No. 69,770)
yimeng.dou@kirkland.com
KIRKLAND & ELLIS LLP
555 South Flower Street, Suite 3700
Los Angeles, CA 90071
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

Meta-Thales-IPR@kirkland.com

*Attorneys for Petitioner Meta Platforms,
Inc.*

Meredith Martin Addy

Meredith Martin Addy (Reg. No. 37,883)
ADDYHART P.C.
10 Glenlake Parkway, Suite 130
Atlanta, Georgia 30328
312.320.4200
312.264.2547 (fax)
Thales-Meta-IPRs@addyhart.com

Robert P. Hart (Reg. No. 35,184)

Joint Request to File Confidential Document
IPR2022-01308

Gregory B. Gulliver (Reg. No. 44,138)
Brandon C. Helms (Reg. No. 61,742)
ADDYHART P.C.
401 N. Michigan Avenue, Suite 1200-1
Chicago, IL 60611
Thales-Meta-IPRs@addyhart.com

David M. Krinsky (Reg. No. 72,339)
D. Shayon Ghosh (Reg. No. 75,865)
Arthur J. Argall III (Reg. No. 73,005)
Adam D. Harber (pro hac vice)
Melissa B. Collins (pro hac vice)
WILLIAMS & CONNOLLY LLP
680 Maine Avenue SW
Washington, DC 20024
(202) 434-5000 (Telephone)
(202) 434-5029 (Facsimile)
Gentex-IPR@wc.com

*Counsel for Patent Owner Thales
Visionix, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on January 17, 2024 via electronic mail directed to counsel of record for the Patent Owner at the following:

Thales-Meta-IPRs@addyhart.com

Gentex-IPR@wc.com

/W. Todd Baker/

W. Todd Baker (No. 45,265)