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 1        UNITED STATES PATENT AND TRADEMARK OFFICE

 2         BEFORE THE PATENT TRIAL AND APPEAL BOARD

 3     ------------------------------------ )

 4     META PLATFORMS, INC.                 )

 5                   Petitioner,            )IPR NO.

 6          vs.                             )2022-01304

 7     THALES VISONIX, INC.,                )

 8                   Patent Owner.          )

 9     ------------------------------------ )

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12              DEPOSITION OF YOHAN BAILLOT

13                   WASHINGTON, D.C.

14                 SEPTEMBER 13, 2023

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22     REPORTED BY:   Tina Alfaro, RPR, CRR, RMR
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Page 1

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 1            Deposition of YOHAN BAILLOT, held at the

 2     offices of:

 3

 4                 Williams & Connolly, LLP

 5                 680 Maine Avenue, SW

 6                 Washington, D.C.

 7

 8            Taken pursuant to notice before Tina M.

 9     Alfaro, a Notary Public within and for the District

10     of Columbia.

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 1     APPEARANCES:

 2          ON BEHALF OF THE PETITIONER:

 3          KIRKLAND & ELLIS, LLP

 4          BY: JOSHUA GLUCOFT, ESQ.

 5               2049 Century Park East

 6               Los Angeles, CA 90067

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13               Washington, D.C. 20024

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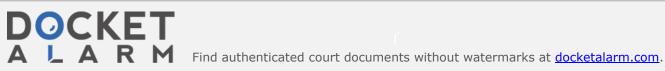
Page 3

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 1                    I N D E X

 2                   EXAMINATION

 3     WITNESS                                    PAGE

 4     YOHAN BAILLOT

 5         By Mr. Glucoft                         5

 6         By Ms. Collins                         214

 7         By Mr. Glucoft                         218

 8            PREVIOUSLY MARKED EXHIBITS

 9     DEPOSITION EXHIBITS                        PAGE

10     Exhibit 1001                              6

           '632 Patent

11

       Exhibit 1003                              209

12         '253 Patent (Foxlin)

13     Exhibit 1007                              7

           Welch 2001 reference

14

       Exhibit 1010                              128

15         '132 Patent (Horton)

16     Exhibit 2007                              8

           Expert report

17

       Exhibit 2011                              92

18         '289 Patent (Harris)

19

20

21

22

                                        Page  4
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 1                        (Witness sworn.)

 2    WHEREUPON:

 3                   YOHAN BAILLOT,

 4    called as a witness herein, having been first duly

 5    sworn, was examined and testified as follows:

 6                      EXAMINATION

 7    BY MR. GLUCOFT:

 8         Q.   Mr. Baillot, are you familiar with Kalman

 9    filters?

10         A.   I am.

11         Q.   Do you agree that a Kalman filter used for

12    tracking must be configured properly to accept a

13    type and format of data produced by a sensor that

14    feeds into it?

15         A.   I agree to that, yeah.

16         Q.   Do you agree that Kalman filters are

17    configured according to the calibration parameters

18    that it uses?

19         A.   I would say that's not the only thing.  It

20    might vary between different Kalman filter type.

21    You need to have -- a bit more specific.

22         Q.   Do you agree that Kalman filters are
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