

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

GENTEX CORPORATION and INDIGO  
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

FACEBOOK, INC. and FACEBOOK  
TECHNOLOGIES, LLC,

Defendants.

Case No. 6:21-cv-00755-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF AKSHAY DEORAS IN SUPPORT OF DEFENDANTS' MOTION  
TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Akshay Deoras, declare as follows:

1. I am an attorney with Kirkland & Ellis LLP and a member of the California state bar. I am admitted to appear pro hac vice in this case. *See* Dkt. No. 18. I represent Meta Platforms, Inc.<sup>1</sup> and Facebook Technologies, LLC (collectively, “Meta” or “Defendants”) in the above-captioned case.

2. I submit this declaration in support of Facebook’s Motion to Transfer Venue to the Northern District of California in this action. I make this Declaration of my own personal knowledge, and I could and would testify competently thereto if called as a witness.

3. Attached to this declaration as **Exhibit A** is a true and correct copy of the home/company page of Gentex Corporation (“Gentex”), *available at* <https://www.gentexcorp.com/company/>, showing that its principal place of business is in Carbondale, Pennsylvania and showing the location of its other facilities in various states, including California. This home/company page shows no facilities or presence anywhere in Texas.

4. Attached to this declaration as **Exhibit B** is a true and correct copy of the of Indigo Technologies, LLC (“Indigo”)’s Certificate of Organization showing that Indigo’s principal place of business is in Simpson, Pennsylvania and that Indigo does not have any facilities or presence in Waco or elsewhere in Texas.

5. Attached to this declaration as **Exhibit C** is a true and correct copy of the contact page of Thales Visionix, Inc. *available at*, <https://www.thalesdsi.com/contact/#1530895740511-3f1c7457-b1c3> showing that Thales Visionix, Inc. has its main office in Aurora, Illinois, with an additional office in Billerica, Massachusetts, with no reference to a facility in Texas.

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<sup>1</sup> Effective October 28, 2021, Facebook, Inc. changed its name to Meta Platforms, Inc. Dkt. 26.

6. Attached to this declaration as **Exhibit D** is a true and correct copy of:
  - Thales' Corporate Disclosure Statement filed in *Elbit Systems of America, LLC v. Thales Visionix, Inc. et al*, No. 1:17-cv-06836 (N.D. Ill., Oct. 6, 2017), showing that Thales Visionix, Inc. is a subsidiary of Thales Defense & Security, Inc.
  - **Exhibit D** also includes the home/contact page of Thales Defense & Security available at <https://www.thalesdsi.com/contact/>, which shows that Thales Defense & Security, Inc. is based in Clarksburg, Maryland, with no reference to a facility in Texas.
7. Attached to this declaration as **Exhibit E** is a true and correct copy of the LinkedIn page for Eric Foxlin, available at <https://www.linkedin.com/in/foxlin/>.
8. Attached to this declaration as **Exhibit F** is a true and correct copy of an excerpt of the Accurint report for Eric Foxlin.
9. Attached to this declaration as **Exhibit G** is a true and correct copy of the LinkedIn page for Michael A. Teitel, available at <https://www.linkedin.com/in/michael-teitel/>.
10. Attached to this declaration as **Exhibit H** is a true and correct copy of an excerpt of the Accurint report for Michael A. Teitel.
11. Attached to this declaration as **Exhibit I** is a true and correct copy of the LinkedIn page for Mike A. Horton, available at <https://www.linkedin.com/in/mikeahorton/>.
12. Attached to this declaration as **Exhibit J** is a true and correct copy of an excerpt of the Accurint report for Mike A. Horton.
13. Attached to this declaration as **Exhibit K** is a true and correct copy of an excerpt of the Accurint report for Vaibhav Vaish.
14. Attached to this declaration as **Exhibit L** is a true and correct copy of the LinkedIn page for Michael Zyda, available at <https://www.linkedin.com/in/mikezyda/>.

15. Attached to this declaration as **Exhibit M** is a true and correct copy of an excerpt of the Accurint report for Michael Zyda.

16. Attached to this declaration as **Exhibit N** is a true and correct copy of the LinkedIn page for William Cockayne, *available at* <https://www.linkedin.com/in/cockayne/>.

17. Attached to this declaration as **Exhibit O** is a true and correct copy of an excerpt of the Accurint report for William Cockayne.

18. Attached to this declaration as **Exhibit P** is a true and correct copy of records of the Massachusetts Secretary of State indicating that Leonid Naimark (co-inventor of the 8,224,024 Patent) resides in Lynn, Massachusetts.

19. Attached to this declaration as **Exhibit Q<sup>2</sup>** is a true and correct copy of:

- “Flight time from Boston [Massachusetts] to Dallas, TX” and “Flight time from Boston [Massachusetts] to Austin, TX” on Prokerala.com, *available at* <https://www.prokerala.com/travel/flight-time/from-boston/to-dallas-tx/> and <https://www.prokerala.com/travel/flight-time/from-boston/to-austin/>, respectively, showing that a direct flight from Massachusetts to either Dallas, TX or Austin, TX takes a minimum of 4 hours and 29 minutes—not including driving time from the airport to Waco, TX.
- **Exhibit Q** also includes a true and correct copy of the page “Driving time from Dallas, TX to Waco, TX” and “Driving time from Austin, TX to Waco, TX” on travelmath.com, *available at* <https://www.travelmath.com/driving-time/from/Dallas,+TX/to/Waco,+TX> and <https://www.travelmath.com/driving-time/from/Austin,+TX/to/Waco,+TX>, respectively, showing that driving from either locations takes a minimum of 1 hour and 30 minutes. The total travel time from Massachusetts to Waco, TX equals a minimum of at least 6 hours.

20. Attached to this declaration as **Exhibit R** is a true and correct copy of the page “Flight time from Boston [Massachusetts] to San Francisco, CA” on Prokerala.com, *available at*

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<sup>2</sup> For all of the exhibits referencing flights from Boston, Pennsylvania, Washington, DC, and Chicago to Waco, TX, I was unable to locate any direct flights to Waco, TX. The alternative fastest route is provided.

<https://www.prokerala.com/travel/flight-time/from-boston/to-san-francisco-ca/>. The total travel time for travel from Massachusetts to San Francisco is 6 hours and 35 minutes.

21. Attached to this declaration as **Exhibit S** is a true and correct copy of:

- “Flight time from Pennsylvania<sup>3</sup> to San Francisco, CA” on Prokerala.com, available at <https://www.prokerala.com/travel/flight-time/from-wilkes-barre-scranton-pa/to-san-francisco-ca/> showing travel time to be 5 hours and 57 minutes.
- “Flight time from Pennsylvania to Dallas, TX” and “Flight time from Pennsylvania to Austin, TX” on Prokerala.com, available at <https://www.prokerala.com/travel/flight-time/from-wilkes-barre-scranton-pa/to-dallas-tx/> and <https://www.prokerala.com/travel/flight-time/from-boston/to-austin/>, respectively, showing that a direct flight from Pennsylvania to either Dallas, TX or Austin, TX takes a minimum of 3 hours and 09 minutes—not including driving time from the airport to Waco, TX. Driving time adds an additional 1 hour and 30 minutes.<sup>4</sup> The total travel time from Pennsylvania to Waco, TX equals a minimum of 4 hours and 39 minutes.

22. Attached to this declaration as **Exhibit T** is a true and correct copy of:

- “Flight time from Washington, DC<sup>5</sup> to San Francisco, CA” on Prokerala.com, available at <https://www.prokerala.com/travel/flight-time/from-washington-dc/to-san-francisco-ca/> showing travel time to be 5 hours and 37 minutes.
- “Flight time from Washington, DC to Dallas, TX” and “Flight time from Washington, DC to Austin, TX” on Prokerala.com, available at <https://www.prokerala.com/travel/flight-time/from-washington-dc/to-dallas-tx/> and <https://www.prokerala.com/travel/flight-time/from-washington-dc/to-austin/>, respectively, showing that a direct flight from Washington, DC to either Dallas, TX or Austin, TX takes a minimum of 3 hours and 05 minutes—not including driving time from the airport to Waco, TX. Driving

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<sup>3</sup> Wilkes-Barre/Scranton, Pennsylvania is the closest airport to Carbondale, Pennsylvania and Simpson, Pennsylvania—Gentex’s principal place of business and Indigo’s principal place of business, respectively.

<sup>4</sup> See **Exhibit Q** which includes a correct copy of the page “Driving time from Dallas, TX to Waco, TX” and “Driving time from Austin, TX to Waco, TX” on travelmath.com, available at <https://www.travelmath.com/driving-time/from/Dallas,+TX/to/Waco,+TX> and <https://www.travelmath.com/driving-time/from/Austin,+TX/to/Waco,+TX>, showing that driving time takes a minimum of 1 hour and 30 minutes.

<sup>5</sup> Washington Dulles International Airport is the nearest airport to Clarksburg, Maryland, the location of Thales Defense & Security, Inc.

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