

**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**

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER AND  
AGREED 502(D) CLAWBACK ORDER**

Plaintiffs Gentex Corporation (“Gentex”) and Indigo Technologies, LLC (“Indigo”), Involuntary Plaintiff Thales Visionix, Inc., and Defendants Meta Platforms, Inc. (“Meta”) and Facebook Technologies, LLC (“Facebook Techs.”) jointly move for entry of the Agreed Protective Order attached hereto as Exhibit A, and the Agreed Federal Rules of Evidence 502(d) Clawback Order attached hereto as Exhibit B.

Dated: April 14, 2022

/s/ G. Blake Thompson

G. Blake Thompson  
State Bar No. 24042033  
blake@themannfirm.com  
J. Mark Mann  
State Bar No. 12926150  
mark@themannfirm.com  
MANN | TINDEL | THOMPSON  
201 E. Howard St.  
Henderson, Texas 75654  
Tel: 903-657-8540  
Fax: 903-657-6003

David I. Berl (*pro hac vice*)  
Adam D. Harber (*pro hac vice*)  
Elise M. Baumgarten (*pro hac vice*)  
Melissa B. Collins (*pro hac vice*)  
D. Shayon Ghosh (*pro hac vice*)  
Arthur John Argall III (*pro hac vice*)  
Andrew G. Borrasso\* (*pro hac vice*)  
WILLIAMS & CONNOLLY LLP  
725 Twelfth Street, N.W.  
Washington, D.C. 20005  
Tel: 202-434-5000  
Fax: 202-434-5029  
dberl@wc.com  
aharber@wc.com  
ebaumgarten@wc.com  
mcollins@wc.com  
sghosh@wc.com  
aargall@wc.com  
aborasso@wc.com

\* Admitted only in Illinois. Practice in the District of Columbia supervised by D.C. Bar members pursuant to D.C. Court of Appeals Rule 49(c)(8).

*Counsel for Plaintiffs Gentex Corporation and Indigo Technologies, LLC*

Dated: April 14, 2022

*OF COUNSEL:*

Jeannie Heffernan (*admitted*)  
Bailey Morgan Watkins (*admitted*)  
KIRKLAND & ELLIS LLP  
401 Congress Avenue  
Austin, TX 78701  
Tel: (512) 678-9100  
Fax: (512) 678-9101  
jeannie.heffernan@kirkland.com  
bailey.watkins@kirkland.com

Ellisen Shelton Turner (*pro hac vice*)  
Joshua Glucoft (*admitted*)  
KIRKLAND & ELLIS LLP  
2049 Century Park East, Suite 3700  
Los Angeles, CA 90067  
Tel: (310) 552-4200  
Fax: (310) 552-5900  
ellisen.turner@kirkland.com  
josh.glucoft@kirkland.com

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

/s/ Ellisen S. Turner

Paige Arnette Amstutz  
Texas State Bar No. 00796136  
SCOTT, DOUGLASS & MCCONNICO, LLP  
303 Colorado Street, Suite 2400  
Austin, TX 78701  
Tel: (512) 495-6300  
Fax: (512) 495-6399  
pamstutz@scottdoug.com

*Counsel for Defendants Meta Platforms, Inc.  
and Facebook Technologies, LLC*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on April 14, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ G. Blake Thompson  
**G. Blake Thompson**