

EXHIBIT GG

**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.

META PLATFORMS, INC. and META
PLATFORMS TECHNOLOGIES, LLC,

Defendants.

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

JURY TRIAL DEMANDED

**PLAINTIFFS GENTEX CORPORATION AND INDIGO TECHNOLOGIES, LLC'S
FIRST SET OF INTERROGATORIES (NOS. 1-15) TO DEFENDANTS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Local Rules CV-26 and CV-33, and the Order Governing Proceedings, Plaintiffs Gentex Corporation and Indigo Technologies, LLC (collectively, "Plaintiffs"), by and through undersigned counsel, submit to Meta Platforms, Inc. and Meta Platforms Technologies, LLC (collectively, "Defendants") the following interrogatories. Defendants are required to answer each interrogatory separately and fully in writing, under oath, and to serve a copy of their answers upon Adam D. Harber, Williams & Connolly LLP, 680 Maine Avenue SW, Washington DC 20024, within 30 days from service hereof.

DEFINITIONS

1. "Meta" means Meta Platforms, Inc., any past or present officers thereof, directors, employees, divisions, subsidiaries, affiliates, predecessors and successors, investors, shareholders, any joint venture to which either may be a party, contractors, consultants,

representatives, agents, and accountants, including any person who served in any such capacity at any time.

2. “Meta Technologies” means Meta Platforms Technologies, LLC, any past or present officers thereof, directors, employees, divisions, subsidiaries, affiliates, predecessors and successors (including but not limited to Facebook Technologies, LLC and Oculus VR, Inc.), investors, shareholders, any joint venture to which either may be a party, contractors, consultants, representatives, agents, and accountants, including any person who served in any such capacity at any time.

3. As used herein, the terms “you,” “your,” and “yours,” means Meta and Meta Technologies, collectively.

4. As used herein, the term “Oculus Products” means any headset made, used, sold, offered for sale, and/or imported by you, including but not limited to the Oculus Rift, Oculus Rift S, Oculus Quest, Oculus Quest 2, and Meta Quest 2.

5. As used herein, the term “Accused Products” means any products currently accused of infringement by Plaintiffs in this case, including but not limited to the Oculus Rift S, Oculus Quest, Oculus Quest 2, and Meta Quest 2, with their respective related instructions, systems, services, and software.

6. As used herein, the term “representative” means any consultant, expert, attorney, contractor, or other person engaged by the designated entity to perform some task or assignment for the entity.

7. As used herein, the term “employee” means any director, trustee, officer, employee, agent, consultant, partner, corporate parent, subsidiary, affiliate, or servant of the

designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

8. As used herein, the terms “person” and “entity” mean any natural person and any other cognizable entity, including, without limitation, corporations, proprietorships, partnerships, joint ventures, joint marketing entities, businesses, consortiums, clubs, associations, foundations, governmental agencies or instrumentalities, societies, and orders.

9. As used herein, the phrase “refer or relate to” shall be understood to apply if the document evidences, mentions, discusses, constitutes, concerns, relates, refers to (directly or indirectly), or in any other way pertains to the subject matter of the request.

10. As used herein, the terms “and” as well as “or” shall be construed either disjunctively or conjunctively, and references shall be construed either as singular or plural, as necessary to bring within the scope of these requests any information or documents and things that might otherwise be construed to be outside their scope.

11. As used herein, the term “all” shall be construed to mean all or any, and the term “any” shall be construed to mean all or any.

12. As used herein, the term “including” means “including but not limited to.”

13. As used herein, the phrase “Patents-in-Suit” shall be construed to mean United States Patent Nos. 6,757,068 (the “’068 patent”), 7,301,648 (the “’648 patent”), 8,224,024 (the “’024 patent”), 6,922,632 (the “’632 patent”), and 7,725,253 (the “’253 patent”), each of which individually is a “Patent-in-Suit.”

14. As used here, the phrase “prior art” shall mean the subject matter described in 35 U.S.C. § 102 and/or § 103, including but not limited to publications, patents, physical devices, products, prototypes, uses, sales, offers for sale, and any documents evidencing the foregoing.

15. As used herein, the term “P2P Pose Solver” means any source code implemented or used at any time by the Accused Products that combines (i) measurements or information about the orientation of an object with (ii) data representing two points associated with the object in an image obtained from a camera (computer vision or other bearing sensors)—to determine the position or pose of an object, including but not limited to the “P2P pose solver” described in the Oculus blog post “Tracking Technology Explained: LED Matching,” available at <https://developer.oculus.com/blog/tracking-technology-explained-led-matching/>, and all source code called by or implementing such functionality.

INSTRUCTIONS

1. Defendants shall restate each interrogatory in its written response followed immediately by its response to each interrogatory. Defendants shall answer each interrogatory separately and fully in accordance with Federal Rule of Civil Procedure 33.

2. Each interrogatory shall be answered fully unless it is in good faith objected to, in which event the reasons for your objection shall be stated in detail. If an objection pertains to only a portion of an interrogatory, or a word, phrase, or clause contained within an interrogatory request, you are required to state your objection to that portion only and respond to the remainder of the interrogatory, using your best efforts to do so. Your answers must be signed by the person providing them, and the objections, if any, are to be signed by the attorney making them.

3. If, in responding to any of these interrogatories, Defendants encounter any ambiguity in construing either the interrogatory or a definition or instruction relevant to it, Defendants shall set forth the matter deemed ambiguous and the construction selected or used in responding to the interrogatory.

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