

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

Parrot S.A. and Parrot, Inc.

Petitioners,

v.

Drone Technologies, Inc.

Patent Owner

Case IPR2014-00730
U.S. Patent No. 7,584,071

Before HOWARD B. BLANKENSHIP, MATTHEW R. CLEMENTS, and
CHRISTOPHER M. KAISER, *Administrative Patent Judges*.

**PETITIONER'S REPLY IN SUPPORT OF
MOTION TO CORRECT EXHIBIT
TO PETITION FOR *INTER PARTES* REVIEW
PURSUANT TO 37 C.F.R. § 42.104(c)**

EXHIBIT LIST

Exhibit #	Reference Name
Ex. 1001	U.S. Patent No. 7,584,071 (the '071 Patent)
Ex. 1002	U.S. Patent No. 5,043,646 ("Smith")
Ex. 1003	French Patent Publication No. 2,789,765 to Potiron
Ex. 1004	Certified English Translation of French Patent No. 2,789,765 ("Potiron")
Ex. 1005	U.S. Patent No. 7,219,861 ("Barr")
Ex. 1006	U.S. Patent No. 6,751,529 ("Fouche")
Ex. 1007	U.S. Patent Application Publication No. 2006/0144994 to Spirov ("Spirov")
Ex. 1008	U.S. Pat. No. 7,145,551 ("Bathiche")
Ex. 1009	U.S. Pat. Pub. No. 2004/0263479 ("Shkolnikov")
Ex. 1010	Expert Declaration of Prof. Raffaello D'Andrea, with Attachments A-C
Ex. 1010, Att. A	U.S. Patent No. 613,809 to Tesla ("Tesla")
Ex. 1010, Att. B	U.S. Patent No. 3,101,569 to Giardina ("Giardina")
Ex. 1010, Att. C	U.S. Patent No. 8,072,417 to Jouanet ("Jouanet")
Ex. 1011	Claim Chart Demonstrating Invalidity of the '071 Patent
Ex. 1012	Declaration of Deborah A. Skolaski
Ex. 1013	Declaration of James E. Hopenfeld
Ex. 1014	Declaration of Prof. Raffaello D'Andrea

Petitioner files this Reply in support of Petitioner's Motion under 37 C.F.R. § 42.104(c) to correct a clerical error in Exhibit 1010. This filing was authorized by the Board on February 2, 2015.

The only issue here is whether Petitioner should be permitted to file a corrected Ex. 1010 that includes the inadvertently omitted "Appendix B." For the reasons in Petitioner's Motion, the correction should be authorized. Patent Owner does not establish otherwise. Petitioner's filing establishes that there were clerical PDF assembly errors that were inadvertent and their correction would not prejudice Patent Owner. Indeed, *Patent Owner made the same errors* when filing its Patent Owner Response, as Exhibits 2013 and 2014 are both missing "Appendix A." Patent Owner's arguments that there are "inconsistencies" and "questions" raised regarding Prof. D'Andrea's declaration in related proceeding IPR2014-00732 are neither relevant nor correct. There is no dispute that Prof. D'Andrea's declaration is in fact Prof. D'Andrea's, as he so testified.

For the reasons set forth in Petitioner's Motion and in the interests of justice, the Board should permit the correction of Ex. 1010.

Dated: February 23, 2015

Respectfully submitted,

/ James E. Hopenfeld /

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CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6 on the Patent Owner by email and U.S. Mail a copy of this Reply in Support of Petitioner's Motion to Correct Exhibit to Petition for *Inter Partes* Review pursuant to 37 C.F.R. § 42.104(c) as follows:

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