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 IPR2014-00732 U.S. Patent No. 8,106,748

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

DECLARATION OF DEBORAH A. SKOLASKI IN SUPPORT OF MOTION TO CORRECT EXHIBT TO PETITION FOR *INTER PARTES* REVIEW 37 C.F.R. § 42.104(c)

PARROT EXHIBIT 1013
Parrot, Inc. v. Drone



I, Deborah A. Skolaski, do hereby declare and state, that all statements made herein of my own knowledge are true and correct and all statements made on information and belief are believed to be true and correct; and further that the statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under the laws of the United States of America..

Weborah A.

Dated: February 9, 2015

- 1. I am a Senior Litigation Paralegal for Osha Liang LLP ("the Firm"), and I work as the lead paralegal assigned to IPR2014-00730 and IPR2014-00732 in the Firm.
- 2. I worked on the filing of the petition in the above-cited IPRs along with another paralegal who is no longer at our firm. We finalized and processed for filing and filed the IPR petition and its exhibits, which included correcting typographical errors and formatting where necessary, assembling and marking the exhibits, and electronically filing the IPR petitions and their exhibits on PRPS.
- 3. During the time leading up to the filing of the IPR petition and its exhibits, the paralegal staff and/or other attorneys on the team collected the pdf files that would eventually be assembled into the final exhibits in various shared folders on our system at the firm. These materials included prior art patents and Dr. D'Andrea's declaration, its attachments, its appendices, and its signature pages.
- 4. On April 30, 2014, Prof. Raffaello D'Andrea sent scanned executed signature pages to the IPR2014-00732 (Exhibit 1011) and IPR2014-00730 (Exhibit 1010) by email, with instructions to insert the signature pages into the final version of his declaration. Each signature page included his hand written signature and the IPR number to which it related. A review of our files shows that the paralegal staff and/or other attorneys on the team received Dr. D'Andrea's signature pages and



one of the members of the team saved the signature pages in a shared folder to be included in the final declaration exhibit, per Dr. D'Andrea's instructions.

- 5. A review of our files also shows that prior to the receipt of the signature pages, the paralegal staff and/or other attorneys on the team received Dr. D'Andrea's Curriculum Vitae and one of the members of the team saved the CV in a shared folder, from which the pdf file should have been retrieved to be included in the final declaration exhibit.
- 6. Due to a clerical mistake during the assembly of Exhibit 1011 to the petition filed in IPR2014-00732, the executed signature page for Exhibit 1010 in IPR2014-00730 was erroneously inserted into Exhibit 1011 in IPR2014-00732 in lieu of Dr. D'Andrea's signature page for Exhibit 1011 in IPR2014-00732. Additionally, Prof. Raffaello D'Andrea's Curriculum Vitae ("Appendix B" to his declaration) was inadvertently not included in Exhibit 1011 in IPR2014-00732. These errors were unintentional and were brought to my attention in January before Dr. D'Andrea's deposition.
- 7. Once the errors were brought to my attention and after we received a letter from Drone's counsel regarding the signature page error, I prepared a corrected Exhibit 1011, which includes the correct signature page and a copy of the pdf file of Dr. D'Andrea's Curriculum Vitae at "Appendix B" to his declaration. In the process of preparing the corrected exhibit, I also applied a new exhibit label



to the front page and more easily identifiable page-numbering to the attachments to the declaration. This corrected Exhibit 1011 was served on Drone's counsel on Monday, January 26, 2015.

