

**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 RAFFAELLO D'ANDREA IN SUPPORT OF
MOTION TO CORRECT EXHIBIT
TO PETITION FOR *INTER PARTES* REVIEW
37 C.F.R. § 42.104(c)**

<p>PARROT EXHIBIT 1015 Parrot, Inc. v. Drone Technologies, Inc. IPR2014-00732</p>
--

I, Raffaello D'Andrea, 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.

Dated: February 1, 2015



A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right, positioned above a solid horizontal line.

1. I have been retained by counsel for Petitioner as an expert witness in the above-captioned proceeding and in IPR2014-00730. I previously prepared declarations that were submitted in support of Petitioner's IPR petitions in both proceedings. I recently learned that in my declaration submitted in this proceeding an incorrect signature page was attached and my CV was missing. I understand this was the result of errors in the process of assembling the declaration into an exhibit prior to Petitioner's counsel's filing of the IPR petitions.

2. I understand that as a result of the signature page error, Drone Technologies, Inc. ("Drone") is challenging whether or not I actually signed my declaration. I further understand that Drone has taken this position because I testified in my deposition that I did not have specific recollection of signing the signature page. When I so testified, however, my intent was that I did not have *explicit* recollection of signing the forms that included my signatures.

3. In my role as head of the Institute for Dynamics Systems and Control at ETH Zurich, I sign about 50 documents a week. Although I examine every single document that I sign, I do not have specific recollections of the act of signing any particular document. I do, however, have a very distinct signature, and it is easy for me to recognize what I signed, and what is forged.

4. I am the author of both declarations supporting Petitioner's IPR petitions referred to in paragraph 1, above. Each declaration accurately reflects my



testimony, and I understood that each declaration was submitted under oath and penalty of perjury. I know that I signed my declarations because I have seen the signature pages and they bear my signature. I also know that I scanned and emailed my signature pages to Petitioner's counsel on or about April 30, 2014, because I have recently seen the email to which I attached the copies of my signature pages. Attached to this declaration as "Attachment A" is a true and correct copy of that email and the accompanying signature pages.

5. The signature page that refers to U.S. Patent No. 7,584,071 was intended for my corresponding declaration in support of the IPR petition setting forth the grounds of unpatentability for the '071 patent (IPR2014-00730). Similarly, the signature page that refers to U.S. Patent No. 8,106,748 was intended for my corresponding declaration in support of the above-captioned IPR petition setting forth the grounds of unpatentability for the '748 patent.

6. I was not aware of the fact that the signature page for my declaration in support of the IPR petition setting forth the grounds of unpatentability for the '071 patent was mistakenly substituted for the signature page intended for the declaration submitted in support of the above-captioned petition until Drone's counsel asked me about the incorrect signature page during my deposition. In preparing for my deposition I also learned that my CV, which is clearly referred to within my declaration as "Appendix B," was missing from my declaration. These

errors in the assembly of my exhibit do not change the fact that I signed the signature pages for both of my declarations and intended for the correct signature page and for my CV to be included with each declaration.

7. I have reviewed the corrected versions of Exhibit 1010 in IPR2014-00730 and Exhibit 1011 in IPR2014-00732 and confirm that in their corrected form they now each include the correct signature page and a copy of my CV, as I originally intended in April/May 2014.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.