

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

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Parrot S.A. and Parrot, Inc.

Petitioners,

v.

Drone Technologies, Inc.

Patent Owner

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

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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)**

**PETITIONER'S REVISED EXHIBIT LIST**

<b>Exhibit #</b>	<b>Reference Name</b>
Ex. 1001	U.S. Patent No. 8,106,748 (“the ’748 Patent”)
Ex. 1002	U.S. Patent No. 5,043,646 (“Smith”)
Ex. 1003	French Patent No. 9901683 to Potiron
Ex. 1004	Certified Translation of French Patent No. 9901683 (“Potiron”)
Ex. 1005	U.S. Pat. Pub. No. 2006/10144994 A1 (“Spirov”)
Ex. 1006	EXHIBIT INTENTIONALLY LEFT BLANK
Ex. 1007	U.S. Pat. No. 7,219,861 (“Barr”)
Ex. 1008	U.S. Pat. No. 6,751,529 (“Fouche”)
Ex. 1009	U.S. Pat. No. 7,145,551 (“Bathiche”)
Ex. 1010	U.S. Pat. Pub. No. 2004/0263479 (“Shkolnikov”)
Ex. 1011	Expert Declaration of Prof. Raffaello D’Andrea with Attachments A-C
Ex. 1011, Att. A	U.S. Patent No. 613,809 to Tesla (“Tesla”)
Ex. 1011, Att. B	U.S. Patent No. 3,101,569 to Giardina (“Giardina”)
Ex. 1011, Att. C	U.S. Patent No. 8,072,417 (“Jouanet”)
Ex. 1012	Claim Chart Demonstrating Invalidity of the ’748 Patent
Ex. 1013	Declaration of Deborah A. Skolaski
Ex. 1014	Declaration of James E. Hopenfeld
Ex. 1015	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 1011 (Paper 14). This filing was authorized by the Board on February 2, 2015. Patent Owner's opposition (Paper 16) should be stricken and expunged as it exceeds the Board's 3-page limit. Even if considered, Patent Owner's arguments have no merit.

The only issue here is whether Petitioner should be permitted to file a corrected Ex. 1011 that includes the correct signature page and 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: 1) that Prof. D'Andrea did in fact sign his declaration, and sent copies of the signature page to counsel for filing; and, 2) that, due to clerical errors, the signature page from the co-pending IPR was attached to the declaration on filing instead of his signature for the declaration in this IPR and Prof. D'Andrea's CV was omitted. There can be no dispute that the declaration is in fact Prof. D'Andrea's declaration, as he so testified.

Patent Owner's arguments are neither relevant nor correct. The "inconsistencies" and "questions" raised by Patent Owner will not help the Board resolve this motion. Petitioner's motion to correct Ex. 1011 should be granted.

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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