

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

U.S. Patent No. 8,106,748

Filed: March 19, 2008

Issued: Jan. 31, 2012

Inventor: Yu-Tuan Lee

Assignee: Drone Technologies, Inc.

Title: Remote-Controlled Motion Apparatus With Acceleration Self-Sense And
Remote Control Apparatus Therefor

Mail Stop PATENT BOARD, PTAB
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,106,748
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 ET SEQ.**

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EXHIBIT LIST

Exhibit #	Reference Name
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 Dr. Raffaello D’Andrea, PhD, 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

I. INTRODUCTION

Petitioners Parrot S.A and Parrot, Inc. (collectively, “Parrot” or “Petitioners”) respectfully request *inter partes* review for claims 1-12 of U.S. Patent No. 8,106,748 (“the ’748 Patent,” attached as Ex. 1001) in accordance with 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42.100 et seq. Each claim of the ’748 Patent is obvious under 35 U.S.C. § 103. The relevant prior art includes references not cited during the prosecution of the ’748 Patent. A claim chart and the declaration of Prof. Raffaello D’Andrea are submitted with this petition.

The ’748 Patent is generally directed to a “remote-controlled motion apparatus with acceleration self-sense and remote control apparatus.” Ex. 1001, 1:1-4.¹ The intent of the ’748 Patent is to allow a user to guide a remotely controlled aircraft by moving a remote control. In theory, accelerometers on the remote control would track the movement of the remote control, the remote control would send a radio signal corresponding to that movement to the remotely controlled aircraft, and the remotely controlled aircraft would use its own accelerometers to move according to the instruction.

¹ Citations to column and line references within patents in this petition use citation format “[column/page]:[line].”

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