

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
Patent 8,106,748

PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

CASE IPR2014-00732

Drone Technologies, Inc. ("Patent Owner") hereby requests the opportunity to have an oral argument at the Board pursuant to 37 C.F.R. § 42.70.

ISSUES TO BE ARGUED

- I. Spirov fails as a primary reference
 - A. Spirov operates as a single, multi-component system, and not in multiple modes.
 - B. As such, there is no reason or motivation to retrofit Spirov's disclosure with a switch to select individual components of the system
- II. The claims of the '748 patent are non-obvious over Spirov in view of the cited secondary references.
 - A. The secondary references do not cure the deficiencies of Spirov.
 - B. Neither Bathiche nor Shkolnikov is analogous art.
- III. The Board's reliance on the D'Andrea declaration is misplaced.
 - A. D'Andrea's unsigned declaration is inadmissible.
 - B. Even if D'Andrea signed a declaration, a different declaration was submitted to the Board.
 - C. Alternatively, D'Andrea's declaration should be given little or no weight.

CONCLUSION

In light of these remarks, Patent Owner respectfully requests the opportunity to have an oral argument at the Board in the above-referenced matter. If the Board has any questions, comments, or suggestions, the undersigned attorney earnestly requests a telephone conference.

While the Patent Owner believes that no fee is due, the Patent Owner authorizes the Board to charge any deficiencies in fees and credit any overpayment of fees to deposit account no. # 502395/2664.

The Patent Owner consents to electronic service of process and receipt of any other correspondence when sent to all of these email addresses:

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Respectfully submitted,

/James G. Dilmore/

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Date of Deposit: May 27, 2015

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on **May 27, 2015**, a copy of the foregoing document was served by email upon the following:

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