IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ROTHSCHILD PATENT IMAGING, LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
PARROT, INC.	§	
	§	
Defendant.	§	
_____	§	

COMPLAINT

Plaintiff Rothschild Patent Imaging, LLC ("Plaintiff" or "RPI") files this original Complaint against Parrot, Inc. ("Defendant" or "Parrot") for infringement of United States Patent No. 8,437,797 ("the '797 Patent") and United States Patent No. 8,204,437 ("the '437 Patent").

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company having an office with an address at 1400 Preston Rd., Suite 400, Plano, TX 75093.

4. On information and belief, Defendant is a New York corporation, with its principal place of business at 3000 Town Center, Ste 2340, Southfield, Michigan, 48075.

5. On information and belief, this Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District,

has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

VENUE

7. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to reside in this district because it is a New York corporation.

COUNT I
(INFRINGEMENT OF UNITED STATES PATENT NO 8,437,797)

8. Plaintiff incorporates paragraphs 1-7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

10. Plaintiff is the owner by assignment of the '797 Patent with sole rights to enforce the '797 Patent and sue infringers.

11. A copy of the '797 Patent, titled "Wireless Image Distribution System and Method," is attached hereto as Exhibit A.

12. The '797 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

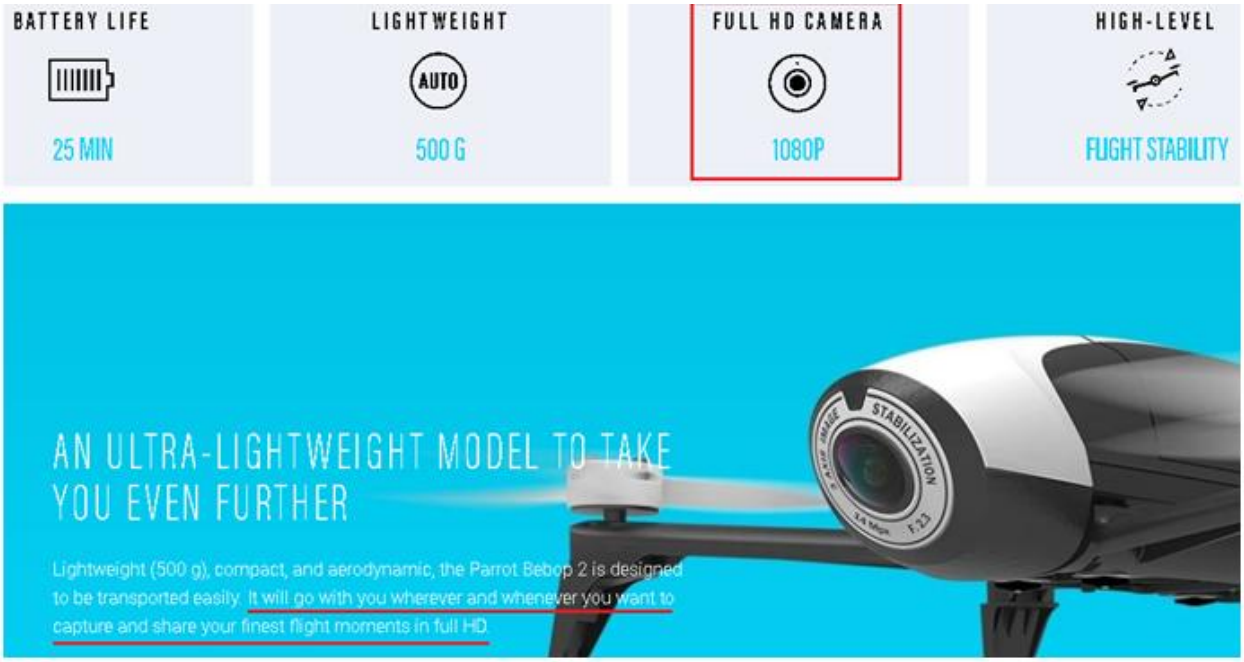
13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims (at least by having its employees, or someone under Defendant's control, test the accused product), including at least Claims 6 and 7 of the '797 Patent by making, using, importing, selling, and/or offering for wireless drone cameras covered by at least Claims 6 and 7 of the '797 Patent.

14. On information and belief, Defendant sells, offers to sell, and/or uses wireless

drone cameras, including, without limitation, the Parrot BEBOP 2 video drone and FreeFlight Pro app, and any similar devices ("Product"), which infringe at least Claims 6 and 7 of the '797 Patent.

15. Regarding Claim 6, the Product is an image-capturing mobile device (e.g., a drone with a camera attachment), which includes a wireless receiver (e.g., a Wi-Fi receiver) and a wireless transmitter (e.g., a Wi-Fi transmitter). On information and belief, the Product receives instructions from a user's smartphone via Wi-Fi utilizing a wireless receiver present on the Product and sends captured images to a user's smartphone via Wi-Fi utilizing a wireless transmitter present on the Product. Certain limitations of the foregoing element are illustrated in the screenshots below.

https://www.parrot.com/us/drones/parrot-bebop-2#parrot-bebop-2-details



https://www.parrot.com/us/drones/parrot-bebop-2#parrot-bebop-2-details

TECHNICAL SPECIFICATIONS

SPECIFICATIONS

- Camera: 14 mega-pixels with fish-eye lens
- Video: 3-axis full HD 1080p
- Stabilisation: Digital stabilisation (Parrot system)
- Battery life: 25 minutes flying time (with 2700 mAh battery)
- GPS: Yes
- Processor: Dual core processor with quad-core GPU
- Storage: 8 GB flash storage system

CONNECTIVITY & PERFORMANCE

- Wi-Fi 802.11a/b/g/n/ac
- Network: MIMO Dual band
- Wi-Fi Aerials: 2.4 and 5 GHz dual dipole aerials
- Output power: Up to 21 dBm
- Signal range: 300 m
- Max horizontal speed: 16 m/s
- Max upward speed: 6 m/s

VIDEO

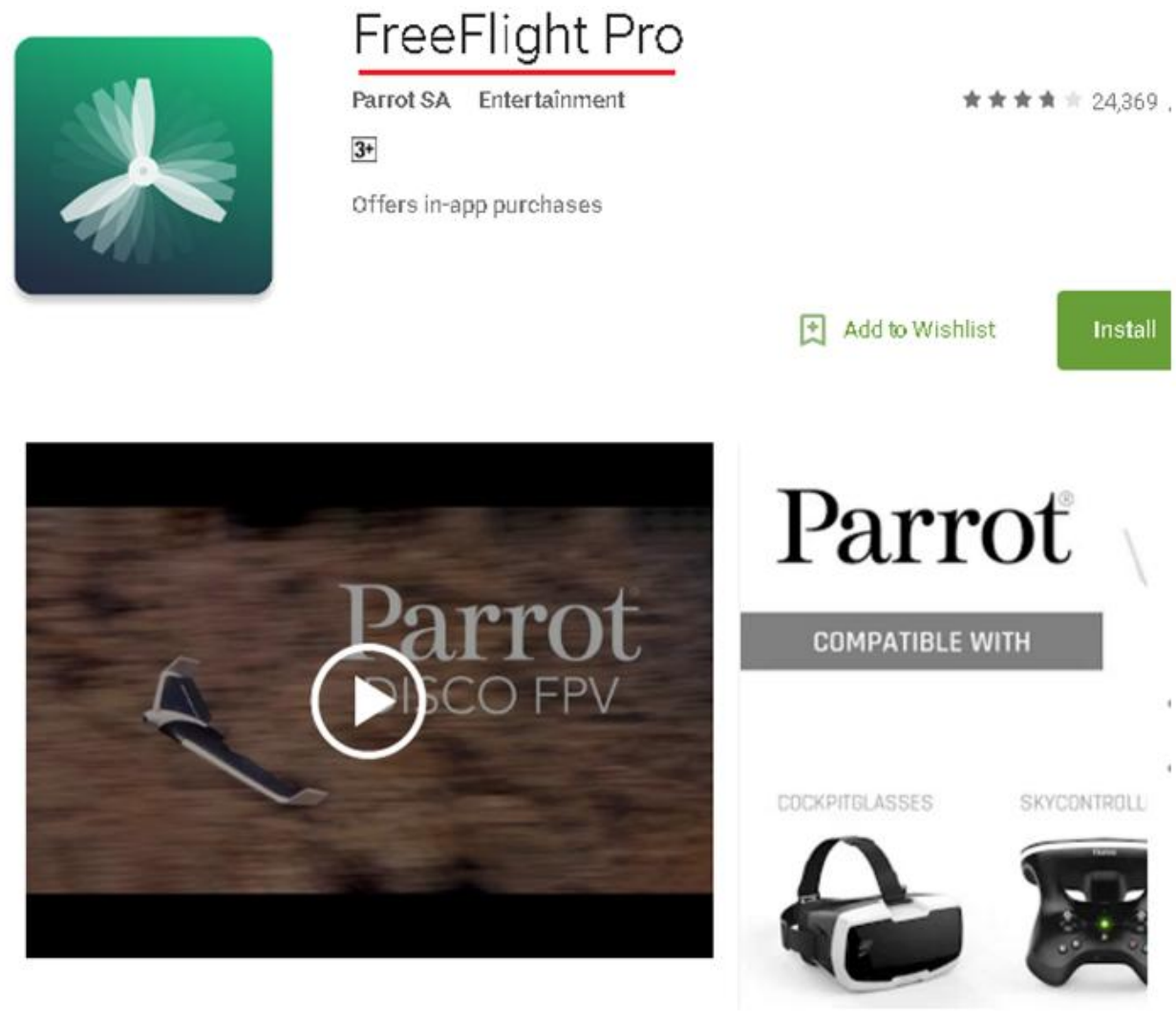
- Sensor: CMOS 14 Mpx
- Optical: Sunny 180° fish-eye lens: 1/2.3" aperture
- Video stabilizer: 3-axis digital system
- Video resolution: 1920 x 1080p (30 fps)
- Photo resolution: 4096 x 3072 pixels
- Video encoding: H264
- Photo format: JPEG, RAW, DNG
- Internal memory: 8 GB Flash

https://www.parrot.com/us/drones/parrot-bebop-2#technicals

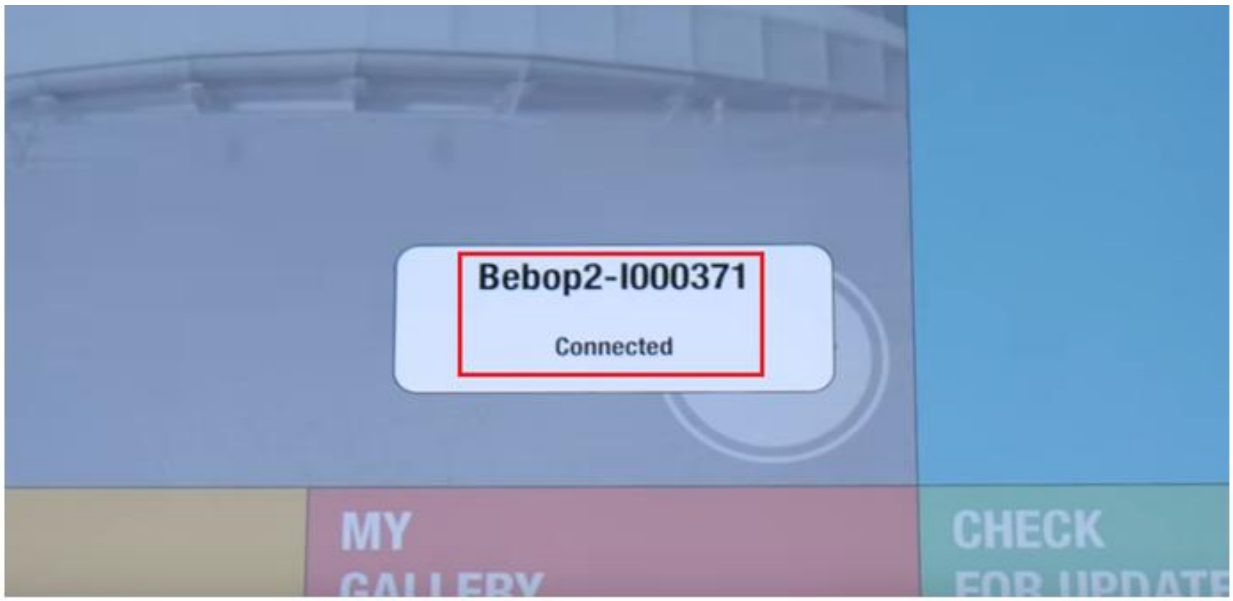
Connecting a smartphone

1. Switch the Bebop 2 on.
2. On your smartphone, carry out a search for Wi-Fi® networks available:
   - if you are using an iPhone or an iPad, select Settings > Wi-Fi;
   - if you are using an Android™ smartphone, select Settings > Wireless and networks > Wi-Fi.
3. Select the network: Bebop2 _xxxxx.
4. Wait for your smartphone to connect to the Wi-Fi network of the Bebop 2. This connection is generally represented by the Wi-Fi logo appearing on the smartphone screen.

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=6#manual



https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en



https://www.youtube.com/watch?v=txL3imXuYSA

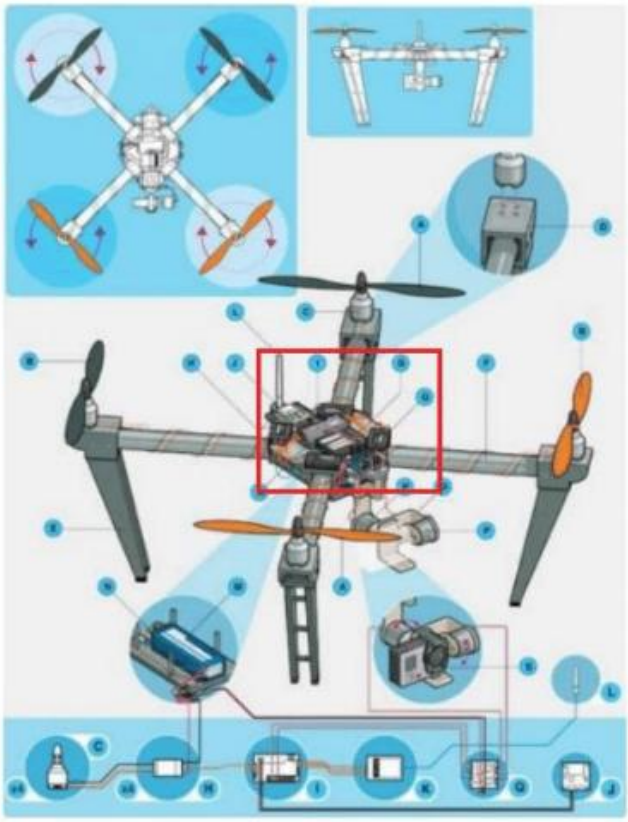
ADVANCED PHOTO AND VIDEO

FreeFlight Pro comes equipped with advanced photo and video settings. Photo Mode allows you to capture high quality images in professional formats like RAW / DNG. You can also record Full HD 1080p videos at 30Mb/s and customize white balance, exposure, and the refresh rate. Time-lapse mode lets you take pictures at scheduled intervals for breathtaking accelerated video footage. Lastly, enjoy real-time video streaming on your smartphone/tablet while in flight.

https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en

16. The Product includes a processor connected to the wireless receiver and transmitter. For example, the Product must have a processor connected to a Wi-Fi module in order to capture and send images to a user's smartphone. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

Drone Parts And Components – Quick Overview



https://www.dronezon.com/learn-about-drones-quadcopters/drone-components-parts-overview-with-tips/

F. Boom

Shorter booms increase maneuverability, while longer booms increase stability. Booms must be tough to hold up in a crash while interfering with prop downdraft as little as possible. In many drones the boom is part of the main body. Other drone have a definite boom as a separate part. The Parrot AR 2.0 has the central cross boom.

Tip: Examine and insure that the boom has not become bent as this would effect the flying capabilities.

G. Main Drone Body Part

This is the central hub from which booms radiate like spokes on a wheel. It houses battery, main boards, processors avionics, cameras, and sensors.

Tip: Most drones are not waterproof so it is vital that the internal components of the main body do not get wet. A hard landing may not break the body of the drone but the shock could damage the internal drone components in the main body.

https://www.dronezon.com/learn-about-drones-quadcopters/drone-components-parts-overview-with-tips/

17. The processor is configured to receive a plurality of photographic images. For example, the Product's camera assembly is able to capture digital images, record video, and capture still image frames from video. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed

herein.

EVERYTHING IS MORE BEAUTIFUL IN HIGH DEFINITION!

As a flying camera, the Parrot Bebop 2 films in 1080p full HD. Even in low light, pictures are incredibly sharp thanks to its wide-angle 14 megapixel lens. Offering horizontal and vertical 180° pictures, it's easy to take aerial photos without losing quality. For professional results, simply choose RAW or DNG from the three formats available.

https://www.parrot.com/us/drones/parrot-bebop-2#parrot-bebop-2-details

SPECIFICATIONS

- Camera: 14 mega-pixels with fish-eye lens
- Video: 3-axis full HD 1080p
- Stabilisation: Digital stabilisation (Parrot system)
- Battery life: 25 minutes flying time (with 2700 mAh battery)
- GPS: Yes
- Processor: Dual core processor with quad-core GPU
- Storage: 8 GB flash storage system

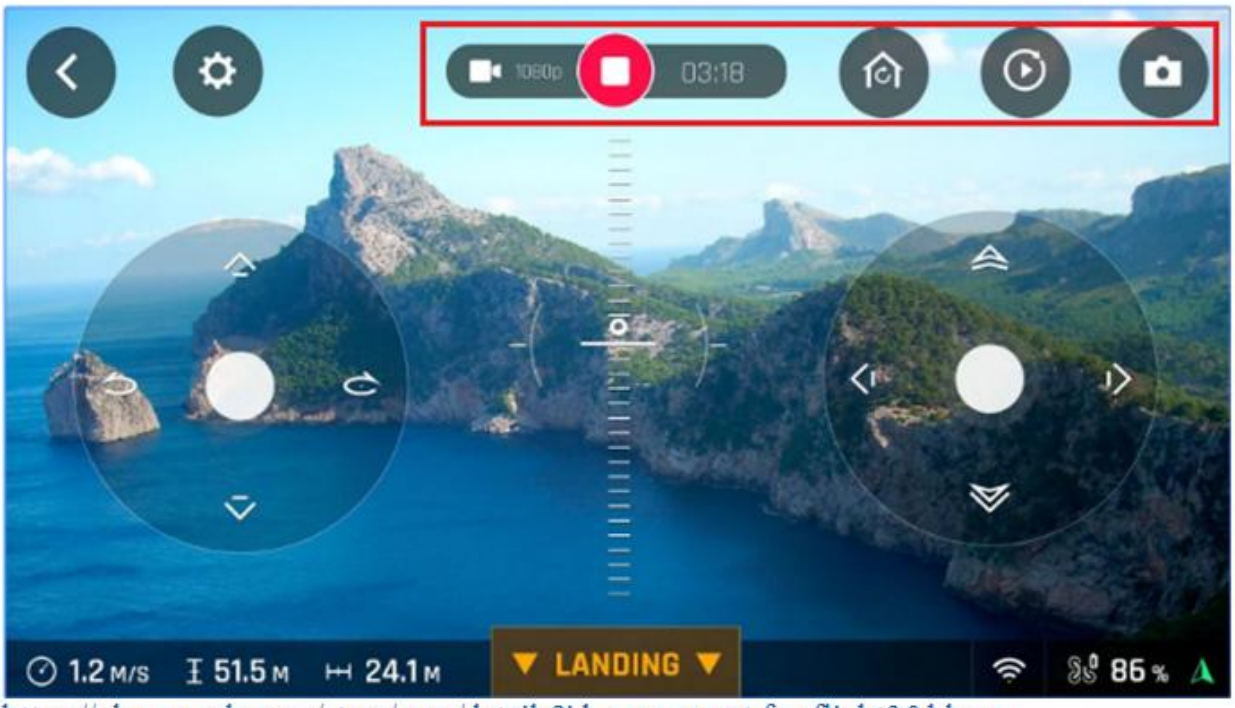
CONNECTIVITY & PERFORMANCE

- Wi-Fi 802.11a/b/g/n/ac
- Network: MIMO Dual band
- Wi-Fi Aerials: 2.4 and 5 GHz dual dipole aerials
- Output power: Up to 21 dBm
- Signal range: 300 m
- Max horizontal speed: 16 m/s
- Max upward speed: 6 m/s

VIDEO

- Sensor: CMOS 14 Mpx
- Optical: Sunny 180° fish-eye lens: 1/2.3" aperture
- Video stabilizer: 3-axis digital system
- Video resolution: 1920 x 1080p (30 fps)
- Photo resolution: 4096 x 3072 pixels
- Video encoding: H264
- Photo format: JPEG, RAW, DNG
- Internal memory: 8 GB Flash

https://www.parrot.com/us/drones/parrot-bebop-2#technicals



https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en

18. The processor filters the images using a transfer criterion. For example, the Product filters the plurality of photographic images (e.g., image frames captured by the Product's

camera assembly during a livestream feed) using a transfer criteria (e.g., a user can select to capture particular image frames as stills/snapshots using the FreeFlight Pro app on a smartphone). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

1	Access the settings
2	Recording resolution: Full HD (1080p) or HD (720p) **NB:** define the recording resolution in the settings. When you record a video in 1080p, the live return video feed is 480p. When you record a video in 720p, the live return video feed is 720p.
3	Video recording time
4	Return home
5	Pre-programmed manoeuvre
6	Take a photo
7	Switch to map mode to see the position of the drone on a map
8	Drone speed
9	Drone altitude
10	Distance of the drone relative to its take off point
11	Land
12	Wi-Fi signal strength
13	Drone battery level
14	Switch to FPV mode **NB**: when you switch to FPV mode, the video automatically switches to HD (720p).

https://parrotcontact.parrot.com/website/user-guides/disco-fpv/FreeFlightPro_User-guide_EN.pdf

19. The processor, in conjunction with the wireless transmitter, sends the filtered images (e.g., the snapshot images selected by the user) to a second mobile device (e.g., a smartphone, tablet, etc. having the FreeFlight Pro app). For example, the Product transmits, via the wireless transmitter (e.g., the Product's Wi-Fi module) and to a second mobile device (e.g., a smartphone having the FreeFlight Pro app installed), the filtered plurality of photographic

images (e.g., the snapshots/stills taken from all the image frames comprising a live stream). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

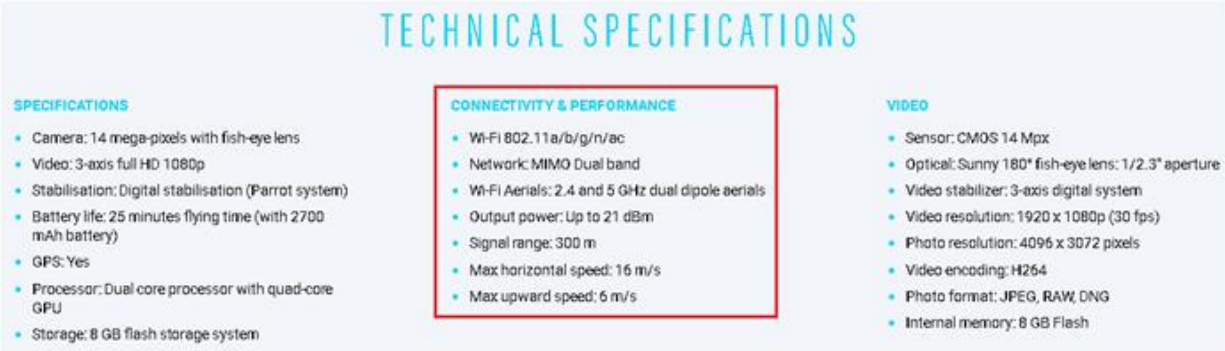
ADVANCED PHOTO AND VIDEO

FreeFlight Pro comes equipped with advanced photo and video settings. Photo Mode allows you to capture high quality images in professional formats like RAW / DNG. You can also record Full HD 1080p videos at 30Mb/s and customize white balance, exposure, and the refresh rate. Time-lapse mode lets you take pictures at scheduled intervals for breathtaking accelerated video footage. Lastly, enjoy real-time video streaming on your smartphone/tablet while in flight.

https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en

20. The processor, in conjunction with the wireless receiver, receives the transfer criteria (e.g., the user's selection of snapshot images) from the second mobile device (e.g., a smartphone with the FreeFlight Pro app installed). For example, the Product receives, via the wireless receiver (e.g., the Product's Wi-Fi module) and from the second mobile device (e.g., a smartphone with the FreeFlight Pro app installed), the transfer criteria (e.g., a user will select stills/snapshots to be taken, from the image frames making up the entirety of a live stream, from a smartphone with the FreeFlight Pro app).

21. Regarding Claim 7, the transmitting is conditional upon the image-capturing mobile device and the second mobile device meeting a pre-defined pairing criteria. For example, image transmission is conditional upon the image-capturing mobile device (e.g., the Product's camera) and the second mobile device (e.g., a smartphone with the FreeFlight Pro app installed) meeting a pre-defined pairing criteria (e.g., both devices are connected over the same Wi-Fi network). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



TECHNICAL SPECIFICATIONS

SPECIFICATIONS

- Camera: 14 mega-pixels with fish-eye lens
- Video: 3-axis full HD 1080p
- Stabilisation: Digital stabilisation (Parrot system)
- Battery life: 25 minutes flying time (with 2700 mAh battery)
- GPS: Yes
- Processor: Dual core processor with quad-core GPU
- Storage: 8 GB flash storage system

CONNECTIVITY & PERFORMANCE

- Wi-Fi 802.11a/b/g/n/ac
- Network: MIMO Dual band
- Wi-Fi Aerials: 2.4 and 5 GHz dual dipole aerials
- Output power: Up to 21 dBm
- Signal range: 300 m
- Max horizontal speed: 16 m/s
- Max upward speed: 6 m/s

VIDEO

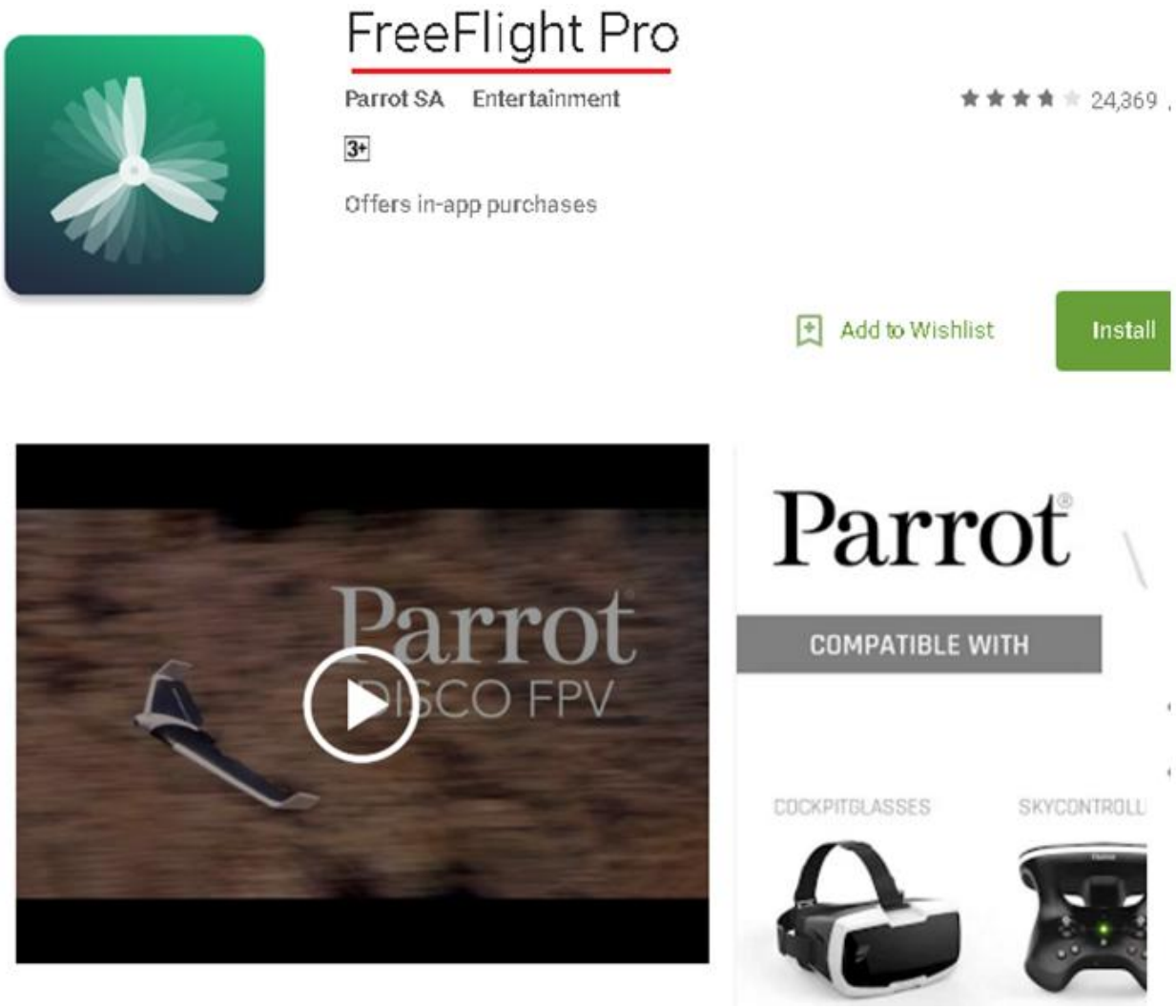
- Sensor: CMOS 14 Mpx
- Optical: Sunny 180° fish-eye lens: 1/2.3" aperture
- Video stabilizer: 3-axis digital system
- Video resolution: 1920 x 1080p (30 fps)
- Photo resolution: 4096 x 3072 pixels
- Video encoding: H264
- Photo format: JPEG, RAW, DNG
- Internal memory: 8 GB Flash

https://www.parrot.com/us/drones/parrot-bebop-2#technicals

Connecting a smartphone

1. Switch the Bebop 2 on.
2. On your smartphone, carry out a search for Wi-Fi® networks available:
   - if you are using an iPhone or an iPad, select Settings > Wi-Fi;
   - if you are using an Android™ smartphone, select Settings > Wireless and networks > Wi-Fi.
3. Select the network: Bebop2 _xxxxx.
4. Wait for your smartphone to connect to the Wi-Fi network of the Bebop 2. This connection is generally represented by the Wi-Fi logo appearing on the smartphone screen.

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=6#manual



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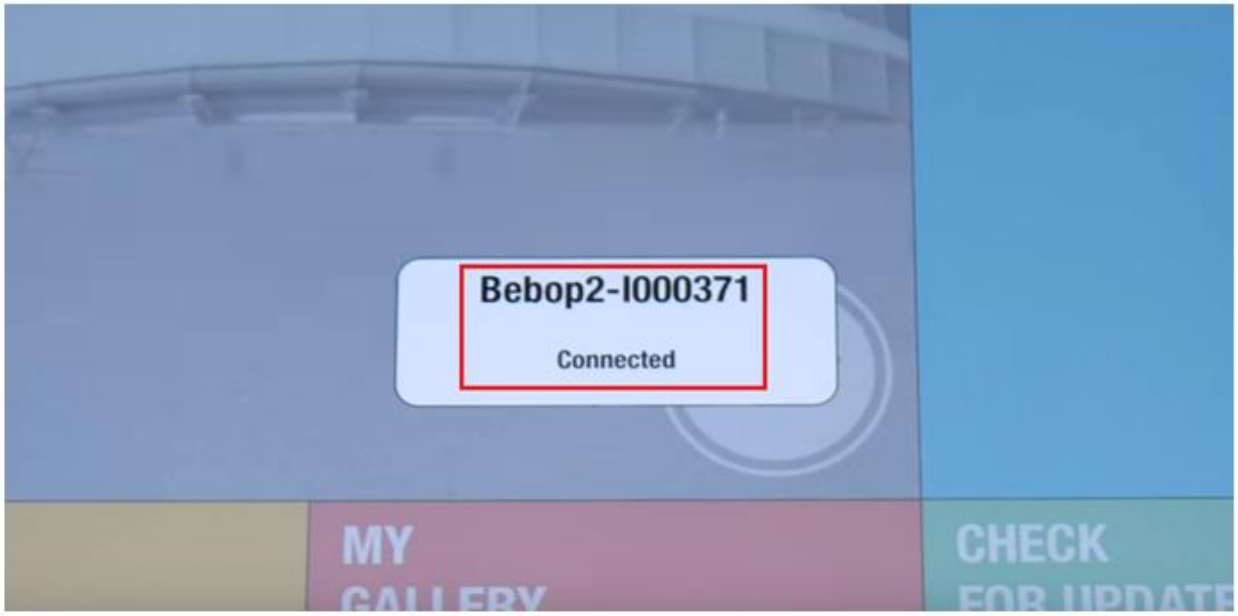


https://www.youtube.com/watch?v=txL3imXuYSA

Wi-Fi type

Connect the Bebop 2 to the 2.4 or 5 G Hz Wi-Fi bands.

- The 2.4 G Hz Wi-Fi band enables you to fly the Bebop 2 from a greater distance. It is generally more congested than the 5 GHz Wi-Fi band in urban areas.
- The 5 G Hz Wi-Fi band enables you to obtain a better **quality** connection between the Bebop 2 and your smartphone for streaming footage. Check your smartphone user guide (or **the technical specifications) to see whether it supports** connection to the 5 G Hz Wi-Fi band. If it does not, use the 2.4 G Hz Wi-Fi band only.

To switch the Wi-Fi band (2.4 G Hz or 5 Gh z) manually without using the application, hold down the on/off button of the Bebop 2 for 5 seconds .

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=27#manual

Max altitude	Define a maximum altitude when you fly the Bebop 2 upwards. **When the Bebop 2 is about to reach this limitation, it stabili**zes at the altitude selected.
Distance max	define a maximum distance when you fly the Bebop 2. When the Bebop 2 is about to reach this limitation, an alert message appears on your smartphone. Note : Before using this feature, make sure the GPS icon is green.

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=23#manual

22. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

23. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

24. Plaintiff is in compliance with 35 U.S.C. § 287.

COUNT II
(INFRINGEMENT OF UNITED STATES PATENT NO 8,204,437)

25. Plaintiff incorporates paragraphs 1-24 herein by reference.

26. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

27. Plaintiff is the owner by assignment of the ‘437 Patent with sole rights to enforce the ‘437 patent and sue infringers.

28. A copy of the ‘437 Patent, titled “Wireless Image Distribution System and Method,” is attached hereto as Exhibit B.

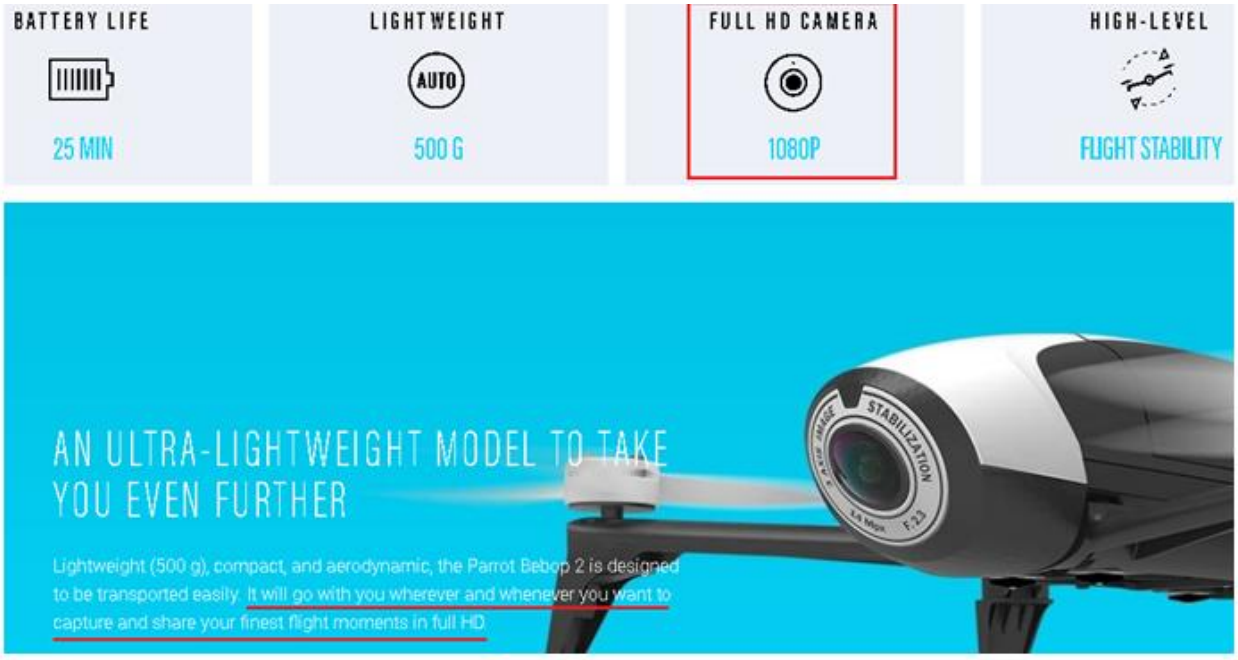
29. The ‘437 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

30. On information and belief, Defendant has infringed and continues to infringe one or more claims (at least by having its employees, or someone under Defendant's control, test the accused product), including at least Claim 1 of the ‘437 Patent by making, using, importing, selling, and/or offering for wireless drone cameras covered by at least Claim 1 of the ‘437 Patent.

31. On information and belief, Defendant sells, offers to sell, and/or uses wireless drone cameras, including, without limitation, the Parrot BEBOP 2 video drone and FreeFlight Pro app, and any similar devices (“Product”), which infringe at least Claim 1 of the ‘437 Patent.

32. The Product is a system that can distribute at least one digital photographic image (e.g., a drone camera with the ability to transmit images to another device). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

https://www.parrot.com/us/drones/parrot-bebop-2#parrot-bebop-2-details



https://www.parrot.com/us/drones/parrot-bebop-2#parrot-bebop-2-details

33. The Product includes at least one capturing device (e.g., a drone with a camera attachment) and at least one receiving device (e.g., a smartphone with the FreeFlight Pro app installed). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

EVERYTHING IS MORE BEAUTIFUL IN HIGH DEFINITION!

As a flying camera, the Parrot Bebop 2 films in 1080p full HD. Even in low light, pictures are incredibly sharp thanks to its wide-angle 14 megapixel lens. Offering horizontal and vertical 180° pictures, it's easy to take aerial photos without losing quality. For professional results, simply choose RAW or DNG from the three formats available.

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TECHNICAL SPECIFICATIONS

SPECIFICATIONS

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- Video: 3-axis full HD 1080p
- Stabilisation: Digital stabilisation (Parrot system)
- Battery life: 25 minutes flying time (with 2700 mAh battery)
- GPS: Yes
- Processor: Dual core processor with quad-core GPU
- Storage: 8 GB flash storage system

CONNECTIVITY & PERFORMANCE

- Wi-Fi 802.11a/b/g/n/ac
- Network: MIMO Dual band
- Wi-Fi Aerials: 2.4 and 5 GHz dual dipole aerials
- Output power: Up to 21 dBm
- Signal range: 300 m
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- Max upward speed: 6 m/s

VIDEO

- Sensor: CMOS 14 Mpx
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- Video stabilizer: 3-axis digital system
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- Photo resolution: 4096 x 3072 pixels
- Video encoding: H264
- Photo format: JPEG, RAW, DNG
- Internal memory: 8 GB Flash

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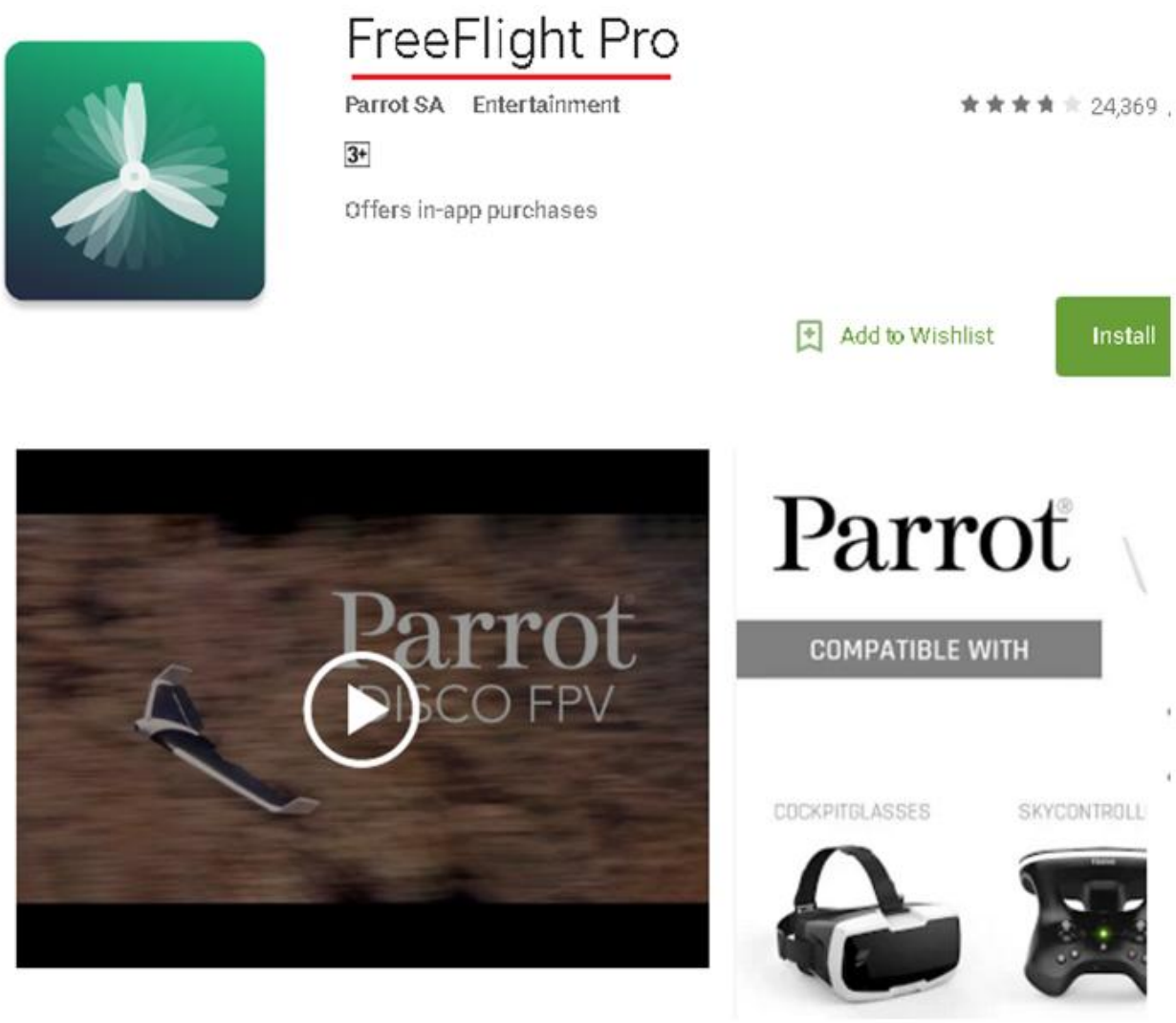

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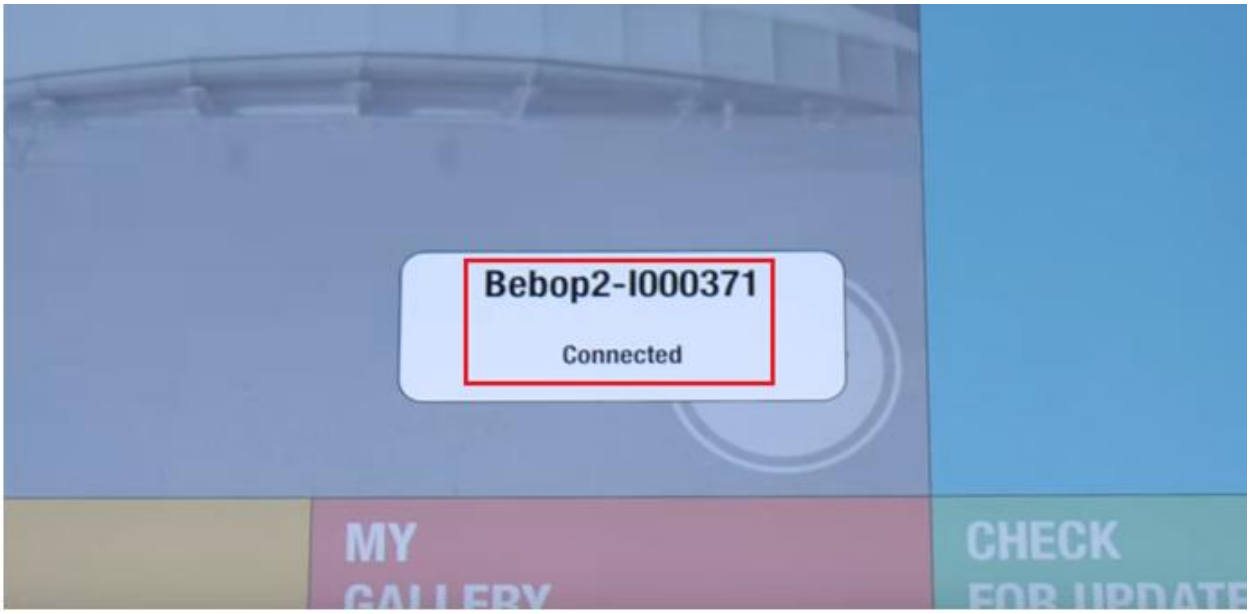

https://www.youtube.com/watch?v=txL3imXuYSA

34. The capturing device and receiving device are cooperatively disposed in a communicative relation with one another via at least one wireless network. For example, the Product includes a capturing device (e.g., a drone with a camera attachment) and a receiving device (e.g., a smartphone with the FreeFlight Pro app) being cooperatively disposed in a communicative relation with one another via at least one wireless network (e.g., both the drone and a user's smartphone will be connected to the same Wi-Fi network allowing for image transfer and live streaming through the Wi-Fi network). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

ADVANCED PHOTO AND VIDEO

FreeFlight Pro comes equipped with advanced photo and video settings. Photo Mode allows you to capture high quality images in professional formats like RAW / DNG. You can also record Full HD 1080p videos at 30Mb/s and customize white balance, exposure, and the refresh rate. Time-lapse mode lets you take pictures at scheduled intervals for breathtaking accelerated video footage. Lastly, enjoy real-time video streaming on your smartphone/tablet while in flight.

https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en

35. The capturing device has a capture assembly that is structured to selectively capture the at least one digital photographic image. For example, the capturing device (e.g., a drone with a camera attachment) has a capture assembly (e.g., a camera assembly), and the capture assembly is structured to selectively capture the at least one digital photographic image (e.g., the Product's camera assembly is able to capture digital images, record video, and capture still image frames from video). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

SPECIFICATIONS

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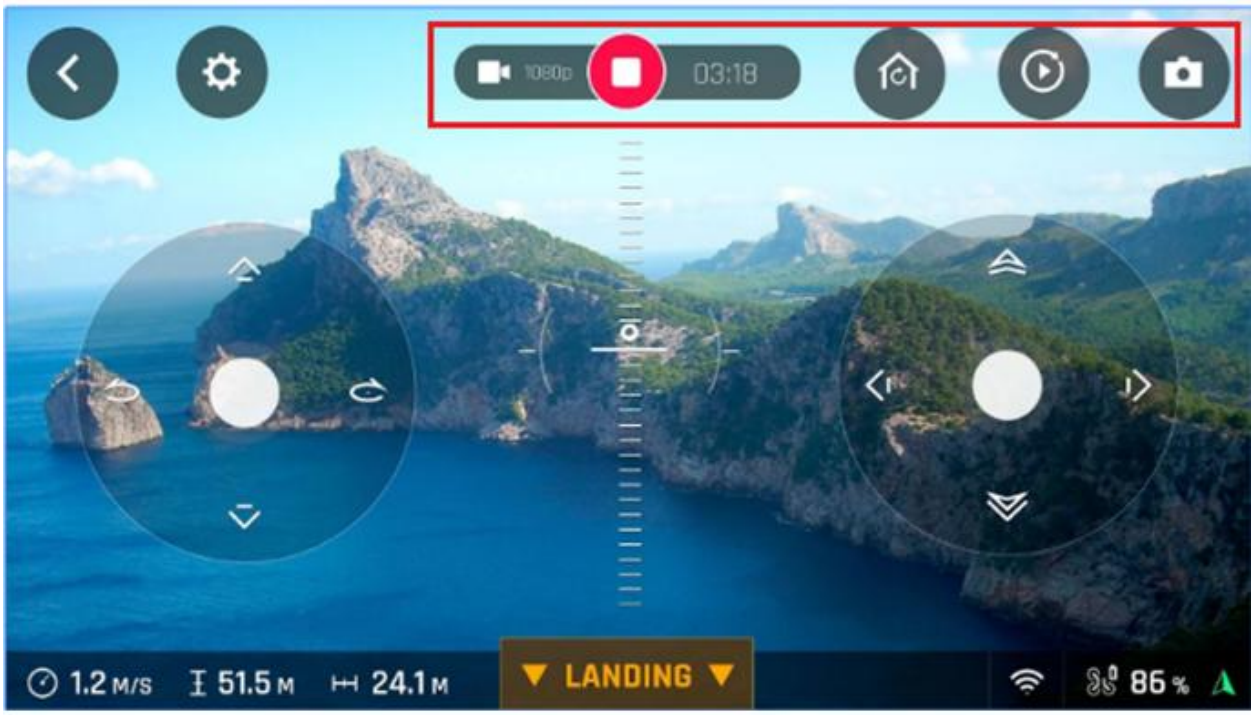
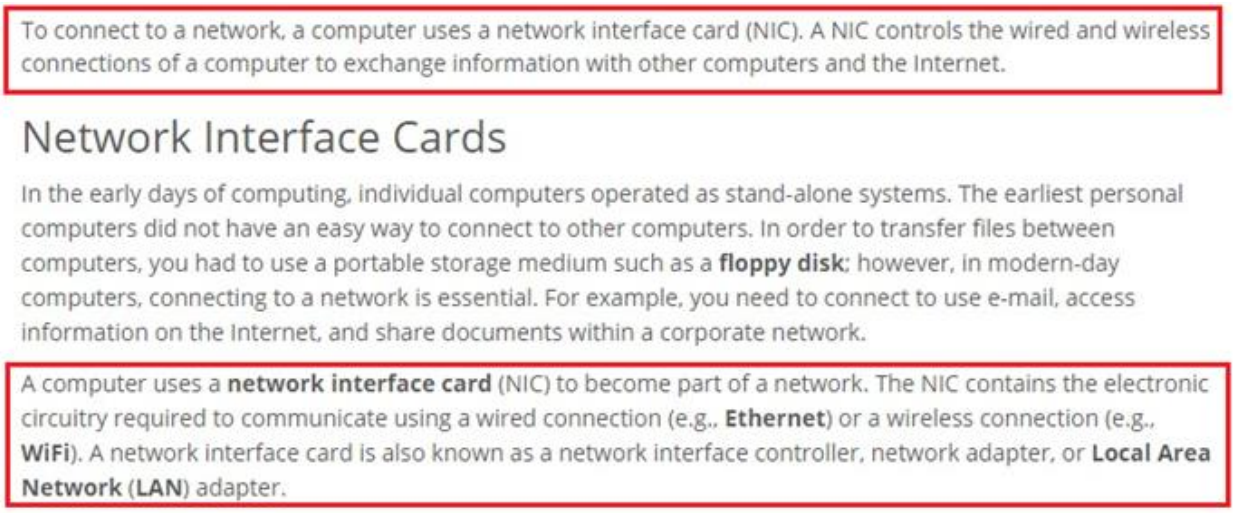
https://www.parrot.com/us/drones/parrot-bebop-2#technicals



https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en

36. The capturing device also has a first network component (e.g., Wi-Fi module). The first network component is structured to communicate the at least one digital photographic image (e.g., images captured by the Product) to the receiving device (e.g., smartphone with FreeFlight Pro app) via the at least one wireless network (e.g., a Wi-Fi network). On information and belief, because the Product is communicating with a smartphone or other device over a Wi-Fi network, it must include a wireless NIC. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



To connect to a network, a computer uses a network interface card (NIC). A NIC controls the wired and wireless connections of a computer to exchange information with other computers and the Internet.

Network Interface Cards

In the early days of computing, individual computers operated as stand-alone systems. The earliest personal computers did not have an easy way to connect to other computers. In order to transfer files between computers, you had to use a portable storage medium such as a **floppy disk**; however, in modern-day computers, connecting to a network is essential. For example, you need to connect to use e-mail, access information on the Internet, and share documents within a corporate network.

A computer uses a **network interface card** (NIC) to become part of a network. The NIC contains the electronic circuitry required to communicate using a wired connection (e.g., **Ethernet**) or a wireless connection (e.g., **WiFi**). A network interface card is also known as a network interface controller, network adapter, or **Local Area Network** (**LAN**) adapter.

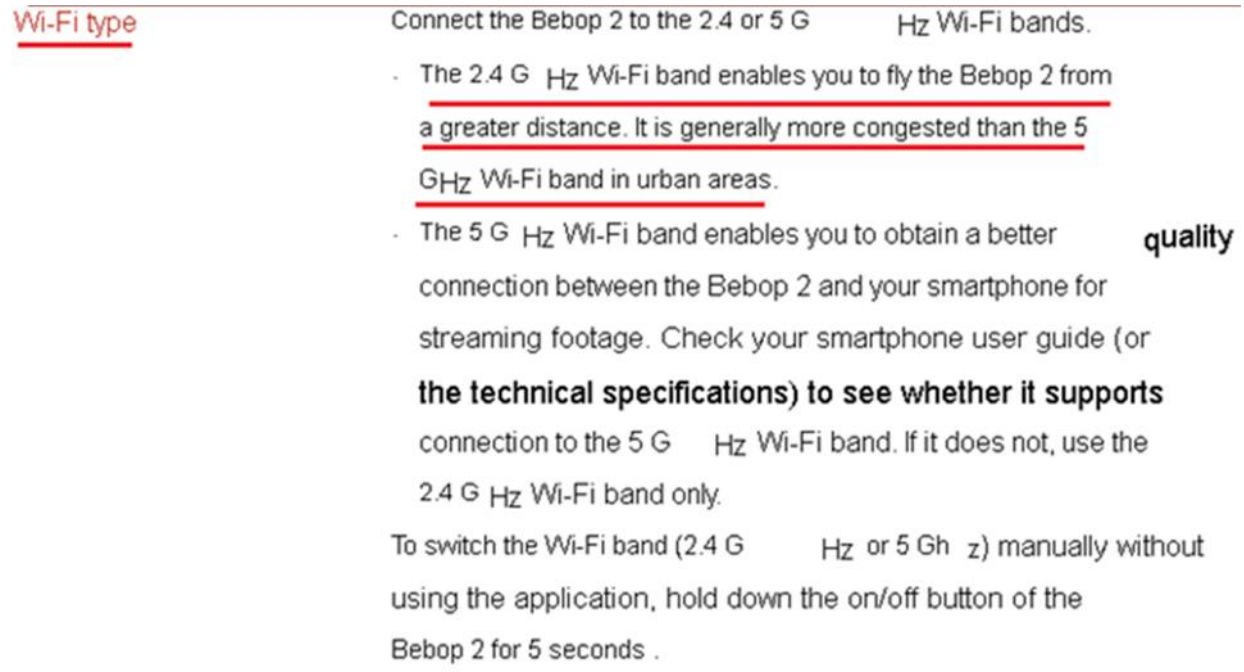
http://study.com/academy/lesson/network-interface-card-nic-types-function-definition.html

37. The receiving device (e.g., smartphone with FreeFlight Pro app installed) has a second network component (e.g., Wi-Fi module within the smartphone). The second network component is structured to receive the at least one digital photographic image (e.g., images captured by the drone camera) from the capturing device via the wireless network (e.g., a Wi-Fi network).

38. The capturing device and the receiving device are disposed in a selectively paired relationship with one another. For example, the capturing device (e.g., a drone with a camera attachment) and the receiving device (e.g., a smartphone with the FreeFlight Pro app installed) are disposed in a selectively paired relationship with one another (e.g., both devices are connected through the same Wi-Fi network).

39. The selectively paired relationship is at least partially based on the capturing device and the receiving device being cooperatively associated with at least one common pre-defined pairing criterion. For example, both devices are connected over the same Wi-Fi network and are within the effective signal range of the Wi-Fi network. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other

elements discussed herein.



Wi-Fi type

Connect the Bebop 2 to the 2.4 or 5 G Hz Wi-Fi bands.

- The 2.4 G Hz Wi-Fi band enables you to fly the Bebop 2 from a greater distance. It is generally more congested than the 5 GHz Wi-Fi band in urban areas.
- The 5 G Hz Wi-Fi band enables you to obtain a better **quality** connection between the Bebop 2 and your smartphone for streaming footage. Check your smartphone user guide (or **the technical specifications) to see whether it supports** connection to the 5 G Hz Wi-Fi band. If it does not, use the 2.4 G Hz Wi-Fi band only.

To switch the Wi-Fi band (2.4 G Hz or 5 Gh z) manually without using the application, hold down the on/off button of the Bebop 2 for 5 seconds .

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=27#manual

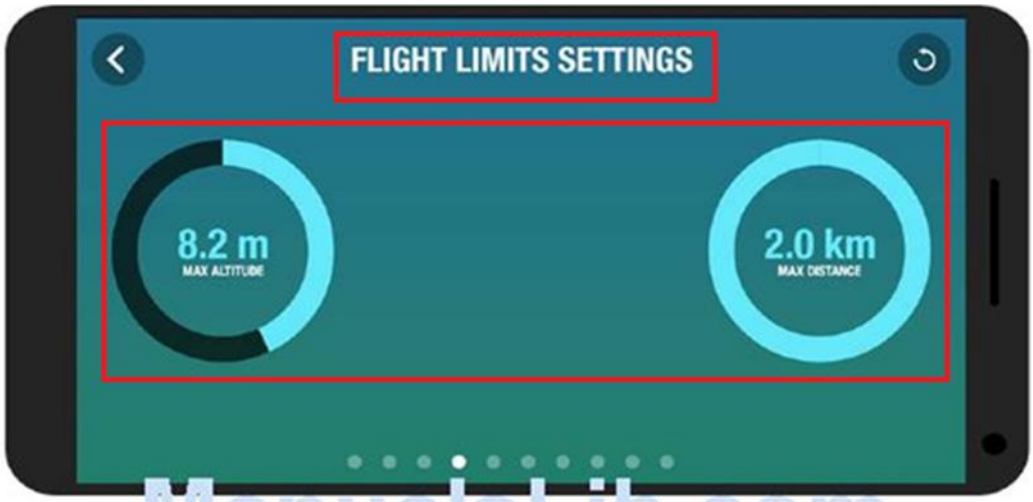
Max altitude	Define a maximum altitude when you fly the Bebop 2 upwards. **When the Bebop 2 is about to reach this limitation, it stabili**zes at the altitude selected.
Distance max	define a maximum distance when you fly the Bebop 2. When the Bebop 2 is about to reach this limitation, an alert message appears on your smartphone. Note : Before using this feature, make sure the GPS icon is green.

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=23#manual

40. The pre-defined pairing criterion is a geographic location of the capturing device. For example, the Product must be located at a geographic location within the signal range of the Wi-Fi network utilized by a user's smartphone in order to pair with said smartphone). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

Wi-Fi type	Connect the Bebop 2 to the 2.4 or 5 G Hz Wi-Fi bands. - The 2.4 G Hz Wi-Fi band enables you to fly the Bebop 2 from a greater distance. It is generally more congested than the 5 GHz Wi-Fi band in urban areas. - The 5 G Hz Wi-Fi band enables you to obtain a better quality connection between the Bebop 2 and your smartphone for streaming footage. Check your smartphone user guide (or the technical specifications) to see whether it supports connection to the 5 G Hz Wi-Fi band. If it does not, use the 2.4 G Hz Wi-Fi band only. To switch the Wi-Fi band (2.4 G Hz or 5 Gh z) manually without using the application, hold down the on/off button of the Bebop 2 for 5 seconds .

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=27#manual



Max altitude	Define a maximum altitude when you fly the Bebop 2 upwards. **When the Bebop 2 is about to reach this limitation, it stabili**zes at the altitude selected.
Distance max	define a maximum distance when you fly the Bebop 2. When the Bebop 2 is about to reach this limitation, an alert message appears on your smartphone. Note : Before using this feature, make sure the GPS icon is green.

https://www.manualslib.com/manual/1044955/Parrot-Bebop-2.html?page=23#manual

FOLLOW ME - GPS & VISUAL TRACKING

Capture your best moments from the sky with high precision.
With the Follow me feature, capture your best moments with high precision thanks to the use of advanced visual recognition technology and the GPS tracking system on your Smartphone.
Cycling, running, rowing, climbing... Everything is possible!
Leave your Smartphone in your pocket and let your drone film you in your everyday activities with complete autonomy.
The "Follow me - GPS & visual tracking" feature is available as an in-app purchase in your Freeflight Pro application.

https://www.parrot.com/us/drones/parrot-bebop-2#follow-me-gps-visual-tracking

FreeFlight Pro comes equipped with advanced photo and video settings. Photo Mode allows you to capture high quality images in professional formats like RAW / DNG. You can also record Full HD 1080p videos at 30Mb/s and customize white balance, exposure, and the refresh rate. Time-lapse mode lets you take pictures at scheduled intervals for breathtaking accelerated video footage. Lastly, enjoy real-time video streaming on your smartphone/tablet while in flight.

PARROT CLOUD

By becoming a member of Parrot Cloud, you can keep track of all your adventures and connect with other drone pilots. Share your photos, videos and data sessions with other pilots and instantly upload to YouTube, Google Photos or Twitter. In addition, you get a free backup of all the data shared on Parrot Cloud.

FlightPlan (in-app purchase)

Prepare pre-programmed autonomous flights from your smartphone or tablet using FlightPlan (in-app purchase). Create customized routes for your drone easily by selecting GPS waypoints on your screen. Hit take-off and watch your drone do the rest! Capture incredible video footage with this intelligent flight modes, including Point of Interest (POI), which allows you to focus your flight session around one object.

https://play.google.com/store/apps/details?id=com.parrot.freeflight3&hl=en

41. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

42. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

43. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order Enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 8,437,797, and 8,204,437 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: January 31, 2018

Respectfully submitted,

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