IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROTHSCHILD PATENT IMAGING LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
AUTEL ROBOTICS USA, LLC	§	
	§	
Defendant.	§	
	§	

COMPLAINT

Plaintiff Rothschild Patent Imaging LLC ("Plaintiff" or "RPI") files this original Complaint against Autel Robotics USA, LLC ("Defendant" or "Autel") 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 Delaware corporation, with its principal place of business at 22522 29th Dr. SE l101, Bothell, WA 98021

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 as it is a Delaware limited liability company.

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 Autel Robotics X-star and Starlink 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.

X-Star

New Worlds. New Adventures.

The X-Star is a sophisticated yet amazingly easy-to-fly quadcopter, designed for superb aerial imagery. The 4K camera, integrated with a 3-axis stabilized gimbal, can record crystal clear Ultra HD videos or take 12 MP photos. An intelligent flight control system and autopilot functions power the quadcopter. It stays safe with precision positioning via dual satellite navigation and our Starpoint Positioning System.

https://www.autelrobotics.com/x-star-camera-drone/

Camera

Breathtaking scenes deserve to be captured at world-class quality. That's why X-Star is equipped with a 4K Ultra HD camera that has 108 degree FOV. Take video at 4K30, 2.7K60, 1080p120, or 720p240 and take 12mp photographs. View the world from above in wide-angle perspective, vivid color, and stunning clarity.

https://www.autelrobotics.com/x-star-camera-drone/

X-Star

New Worlds. New Adventures.

The X-Star is a sophisticated yet amazingly easy-to-fly quadcopter, designed for superb aerial imagery. The 4K camera, integrated with a 3-axis stabilized gimbal, can record crystal clear Ultra HD videos or take 12 MP photos. An intelligent flight control system and autopilot functions power the quadcopter. It stays safe with precision positioning via dual satellite navigation and our Starpoint Positioning System.

https://www.autelrobotics.com/x-star-camera-drone/

Camera

The **X-Star** and **X-Star Premium** are both equipped with a 4k UHD camera. The camera supports various shooting modes including single shot, burst shooting, AEB and time lapse. Videos can be recorded in MOV or MP4 formats, and photos can be saved in JPG or DNG formats. An HD live view from the camera can be displayed on your mobile device through the mobile app **Starlink™**.
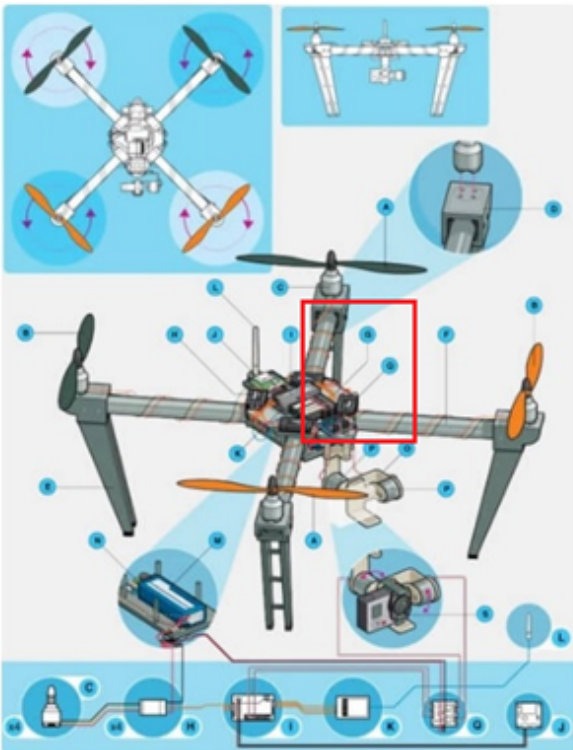
Remote Controller

The remote controller enables wireless communication with the aircraft through a 5.8GHz radio frequency band. The maximum working range of the remote controller in an open area is about 500m when set as CE standard, or about 1000m (**X-Star**)/2000m (**X-Star Premium**) when set as FCC standard.

The built-in 2.4GHz WiFi module of the **X-Star** remote controller and 900MHz HD video streaming module of the **X-Star Premium** remote controller allow video downlink from the aircraft for real-time flight and video data displayed on the app, enabling convenient control of aerial photography and remote piloting.

① Antennas	• The left antenna transmits 5.8GHz RF signal to the aircraft for sending commands and receiving flight information. • Both antennas receive 2.4GHz WiFi signal (**X-Star**) or 900MHz HD video signals (**X-Star Premium**) from the aircraft and transfer the flight data and camera data to the connected mobile app.
② Mobile Device Holder	Holds the mobile device with a 180° adjustable viewing angle for optimum visibility.
③ Flight Information Panel	Displays the flight status, warning messages and real-time instructions. (🖰 13)
④ Left Command Stick	Set by default: Upward / Downward and Turn Left / Turn Right
⑤ Right Command Stick	Set by default: Forward / Backward and Move Left / Move Right
⑥ Strap Hole	Attached to a neck strap for easy portability.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

16.   The Product includes a processor operably connected to the wireless receiver and transmitter, wherein the processor is configured to initiate and/or perform. (e.g., 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.

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

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.

Tip: If you are not familiar with electronic engineering and soldering, then it is best not to learn on your internal components such as the main board in your drone. More than likely soldering something inside your main body will void your warranty. A warranty generally covers the UAV as it left the factory.

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. (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.

Camera

Breathtaking scenes deserve to be captured at world-class quality. That's why X-Star is equipped with a 4K Ultra HD camera that has 108 degree FOV. Take video at 4K30, 2.7K60, 1080p120, or 720p240 and take 12mp photographs. View the world from above in wide-angle perspective, vivid color, and stunning clarity.

https://www.autelrobotics.com/x-star-camera-drone/

Camera

The **X-Star** and **X-Star Premium** are both equipped with a 4k UHD camera. The camera supports various shooting modes including single shot, burst shooting, AEB and time lapse. Videos can be recorded in MOV or MP4 formats, and photos can be saved in JPG or DNG formats. An HD live view from the camera can be displayed on your mobile device through the mobile app **Starlink™**.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Starlink App

- Adjust camera settings to capture videos or photos precisely how you want them to be.

- Configure your aircraft's flight control settings to best suit your preferences.

- Smart Pre-flight Check: Ensure every aspect of your aircraft is safe and ready for flight by running a pre-flight check.

- Enjoy an HD live video feed from your 4K camera even when the X-Star is a speck on the horizon.

https://www.autelrobotics.com/x-star-camera-drone/

Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink**™ configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink**™ app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)

- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink**™ according to the following procedures.

➢ **To install Starlink™:**

    A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

        Available on the App Store   Get it on Google play

    B. Download Starlink™ from the official website:

        1. Visit http://www.autelrobotics.com

        2. Download from **Support** > **Downloads** > **Software & App**

        3. Install the mobile app on your mobile device

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Autel Robotics Starlink

View More by This Developer

By Autel Intelligent Technology Co., Ltd.

This app is only available on the App Store for iOS devices.

Description

With the Starlink App, it's easy to control your Autel Robotics X–Star or X–Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points.Learn the basics and more with Academy's tutorial videos, FAQs and manuals.
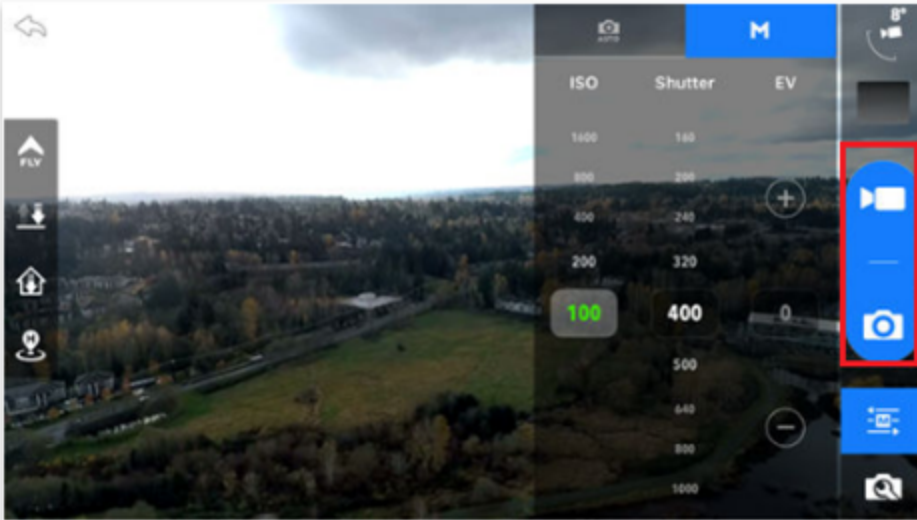
For Use With:
X–Star and X–Star Premium drones.

This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
- Enjoy an HD live video feed from your 4K camera
- Configure your aircraft's flight control settings
- Monitor aircraft flight data
- Adjust camera settings to create precision videos and still images
- Use Smart Pre–flight Check to ensure a safe flight
- Set autopilot features such as Follow, Orbit and Waypoints Points
- Learn with Academy– tutorial videos, FAQs and manuals

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

18.   The Product filters the plurality of photographic images (e.g., image frames captured by the accused product's camera assembly during a livestream feed) using a transfer criterion (e.g., a user can select to capture particular image frames as stills/snapshots using the Starlink App on a smartphone).

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 Starlink 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 with the Starlink 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.

Camera

Breathtaking scenes deserve to be captured at world-class quality. That's why X-Star is equipped with a 4K Ultra HD camera that has 108 degree FOV. Take video at 4K30, 2.7K60, 1080p120, or 720p240 and take 12mp photographs. View the world from above in wide-angle perspective, vivid color, and stunning clarity.

https://www.autelrobotics.com/x-star-camera-drone/

Camera

The **X-Star** and **X-Star Premium** are both equipped with a 4k UHD camera. The camera supports various shooting modes including single shot, burst shooting, AEB and time lapse. Videos can be recorded in MOV or MP4 formats, and photos can be saved in JPG or DNG formats. An HD live view from the camera can be displayed on your mobile device through the mobile app **Starlink™**.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Starlink App

- Adjust camera settings to capture videos or photos precisely how you want them to be.

- Configure your aircraft's flight control settings to best suit your preferences.

- Smart Pre-flight Check: Ensure every aspect of your aircraft is safe and ready for flight by running a pre-flight check.

- Enjoy an HD live video feed from your 4K camera even when the X-Star is a speck on the horizon.

https://www.autelrobotics.com/x-star-camera-drone/

Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink**™ configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink**™ app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)
- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink**™ according to the following procedures.

➢ **To install Starlink™:**

A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

    [Available on the **App Store**]   [Get it on **Google play**]

B. Download Starlink™ from the official website:

    1. Visit http://www.autelrobotics.com

    2. Download from **Support** > **Downloads** > **Software & App**

    3. Install the mobile app on your mobile device

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

How to Connect

Slide the center of the screen to choose your aircraft and tap this button to follow the pop-up instructions to connect your mobile device. When your connection is successful, this button turns to green and displays **Connected**.

⊘ NOTE

When your aircraft is used for the first time, you will be guided to the registration page after the connection is completed. Please follow the on-screen instructions to activate your **X-Star/X-Star Premium**:

1. Create an account and set a password for your account.

2. Name your **X-Star/X-Star Premium**.

3. Select a **Command Stick Mode**, **Parameter Unit** and **System**.

4. Confirm that the **Beginner Mode** is enabled. This mode is enabled by default when you use the product for the first time, and you may disable **Beginner Mode** through the app: **Settings** (⚙) > **Flight Control Settings** (▣) > **Beginner Mode** (🗋 51).

---

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

---

Autel Robotics Starlink   View More by This Developer

By Autel Intelligent Technology Co., Ltd.

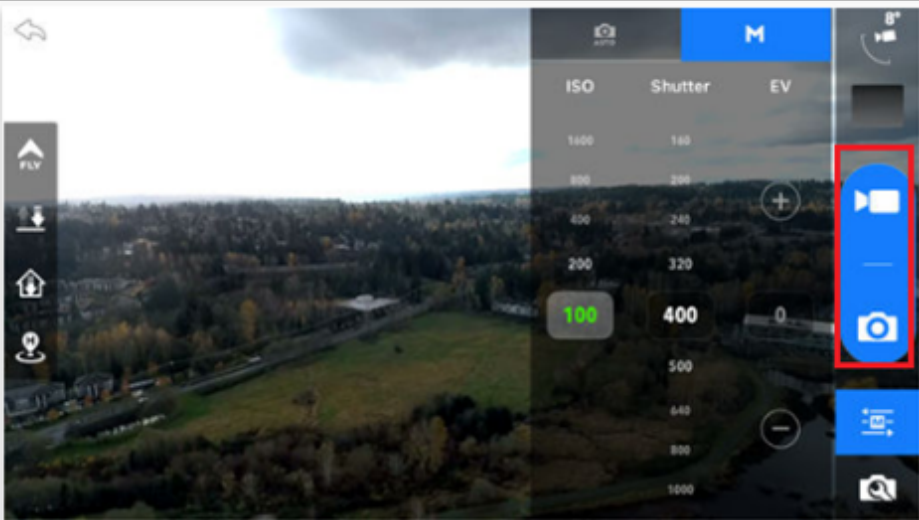This app is only available on the App Store for iOS devices.

Description

With the Starlink App, it's easy to control your Autel Robotics X-Star or X-Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points. Learn the basics and more with Academy's tutorial videos, FAQs and manuals.

For Use With:
X-Star and X-Star Premium drones.

⊞ This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
· Enjoy an HD live video feed from your 4K camera
· Configure your aircraft's flight control settings
· Monitor aircraft flight data
· Adjust camera settings to create precision videos and still images
· Use Smart Pre-flight Check to ensure a safe flight
· Set autopilot features such as Follow, Orbit and Waypoints Points
· Learn with Academy- tutorial videos, FAQs and manuals

---

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

20.   The processor, in conjunction with the wireless receiver, receives the transfer criteria from the second mobile device (e.g., a smartphone with the Starlink app installed). For example, 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 Starlink 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 Starlink app installed) meeting a pre-defined pairing criterion (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.

Starlink App

- Adjust camera settings to capture videos or photos precisely how you want them to be.

- Configure your aircraft's flight control settings to best suit your preferences.

- Smart Pre-flight Check: Ensure every aspect of your aircraft is safe and ready for flight by running a pre-flight check.

- Enjoy an HD live video feed from your 4K camera even when the X-Star is a speck on the horizon.

https://www.autelrobotics.com/x-star-camera-drone/

Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink™** configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink™** app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)
- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink™** according to the following procedures.

➢ **To install Starlink™:**

    A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

    B. Download Starlink™ from the official website:

       1. Visit http://www.autelrobotics.com

       2. Download from **Support** > **Downloads** > **Software & App**

       3. Install the mobile app on your mobile device

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Connecting the Mobile Device

The **X-Star/X-Star Premium** network is established when the aircraft, the remote controller and the mobile device are properly connected. This enables the mobile device to receive real-time flight data and video footage during flight so you can monitor flight maneuvers through the mobile app.

➢ **To connect the mobile device to the aircraft**

1. Power up the remote controller and the aircraft successively.

2. Connect your mobile device.

    X-Star:

    Turn on the WiFi connection on your mobile device, select **X-Star_××××××** from the WiFi list, and enter the default password **99999999**.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Autel Robotics Starlink   View More by This Developer

By Autel Intelligent Technology Co., Ltd.

This app is only available on the App Store for iOS devices.

Description

With the Starlink App, it's easy to control your Autel Robotics X-Star or X-Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points.Learn the basics and more with Academy's tutorial videos, FAQs and manuals.

For Use With:
X-Star and X-Star Premium drones.

+ This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
· Enjoy an HD live video feed from your 4K camera
· Configure your aircraft's flight control settings
· Monitor aircraft flight data
· Adjust camera settings to create precision videos and still images
· Use Smart Pre-flight Check to ensure a safe flight
· Set autopilot features such as Follow, Orbit and Waypoints Points
· Learn with Academy- tutorial videos, FAQs and manuals

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

✏ **NOTE**

- Follow mode is valid within 100 meters radius centering the mobile device. However, the aircraft will not turn its nose towards the mobile device when the horizontal distance between them is less than 3 meters.
- You can choose a location (your current position or the initial home point) for your aircraft to return to when **Failsafe** is activated in **Follow** mode.

❗ **IMPORTANT**

- **Orbit** and **Follow** modes cannot be activated when the aircraft is less than 10 meters high above the home point. Once you have activated **Follow** or **Orbit** mode, the altitude limit will be cancelled.
- In **Follow** or **Orbit** mode, if the GPS signal of your mobile device is too weak, the aircraft will switch to hover mode until the GPS signal quality becomes acceptable again. Follow/Orbit mode will be cancelled automatically after 15 seconds of poor GPS reception of the mobile device.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

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 Autel Robotics Drone and the Starlink 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.

X-Star

New Worlds. New Adventures.

The X-Star is a sophisticated yet amazingly easy-to-fly quadcopter, designed for superb aerial imagery. The 4K camera, integrated with a 3-axis stabilized gimbal, can record crystal clear Ultra HD videos or take 12 MP photos. An intelligent flight control system and autopilot functions power the quadcopter. It stays safe with precision positioning via dual satellite navigation and our Starpoint Positioning System.

https://www.autelrobotics.com/x-star-camera-drone/

Camera

Breathtaking scenes deserve to be captured at world-class quality. That's why X-Star is equipped with a 4K Ultra HD camera that has 108 degree FOV. Take video at 4K30, 2.7K60, 1080p120, or 720p240 and take 12mp photographs. View the world from above in wide-angle perspective, vivid color, and stunning clarity.

https://www.autelrobotics.com/x-star-camera-drone/

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 Starlink 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.

Camera

The **X-Star** and **X-Star Premium** are both equipped with a 4k UHD camera. The camera supports various shooting modes including single shot, burst shooting, AEB and time lapse. Videos can be recorded in MOV or MP4 formats, and photos can be saved in JPG or DNG formats. An HD live view from the camera can be displayed on your mobile device through the mobile app **Starlink™**.

https://3yn7uf15sq4l1ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink™** configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink™** app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)
- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink™** according to the following procedures.

➢ **To install Starlink™:**

   A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

   B. Download Starlink™ from the official website:
      1. Visit http://www.autelrobotics.com
      2. Download from **Support** > **Downloads** > **Software & App**
      3. Install the mobile app on your mobile device

https://3yn7uf15sq4l1ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Autel Robotics Starlink
By Autel Intelligent Technology Co., Ltd.
This app is only available on the App Store for iOS devices.

Description

With the Starlink App, it's easy to control your Autel Robotics X-Star or X-Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points.Learn the basics and more with Academy's tutorial videos, FAQs and manuals.

For Use With:
X-Star and X-Star Premium drones.

This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
· Enjoy an HD live video feed from your 4K camera
· Configure your aircraft's flight control settings
· Monitor aircraft flight data
· Adjust camera settings to create precision videos and still images
· Use Smart Pre-flight Check to ensure a safe flight
· Set autopilot features such as Follow, Orbit and Waypoints Points
· Learn with Academy- tutorial videos, FAQs and manuals

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

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 Starlink 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.

How to Connect

Slide the center of the screen to choose your aircraft and tap this button to follow the pop-up instructions to connect your mobile device. When your connection is successful, this button turns to green and displays **Connected**.

✎ **NOTE**

When your aircraft is used for the first time, you will be guided to the registration page after the connection is completed. Please follow the on-screen instructions to activate your **X-Star/X-Star Premium**:

1. Create an account and set a password for your account.

2. Name your **X-Star/X-Star Premium**.

3. Select a **Command Stick Mode**, **Parameter Unit** and **System**.

4. Confirm that the **Beginner Mode** is enabled. This mode is enabled by default when you use the product for the first time, and you may disable **Beginner Mode** through the app: **Settings** (⚙) > **Flight Control Settings** (✖) > **Beginner Mode** (📋 51).

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

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.

Camera

The **X-Star** and **X-Star Premium** are both equipped with a 4k UHD camera. The camera supports various shooting modes including single shot, burst shooting, AEB and time lapse. Videos can be recorded in MOV or MP4 formats, and photos can be saved in JPG or DNG formats. An HD live view from the camera can be displayed on your mobile device through the mobile app **Starlink™**.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Starlink App

- Adjust camera settings to capture videos or photos precisely how you want them to be.

- Configure your aircraft's flight control settings to best suit your preferences.

- Smart Pre-flight Check: Ensure every aspect of your aircraft is safe and ready for flight by running a pre-flight check.

- Enjoy an HD live video feed from your 4K camera even when the X-Star is a speck on the horizon.

https://www.autelrobotics.com/x-star-camera-drone/

Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink™** configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink™** app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)
- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink™** according to the following procedures.

➢ **To install Starlink™:**

A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

B. Download Starlink™ from the official website:

1. Visit http://www.autelrobotics.com
2. Download from **Support** > **Downloads** > **Software & App**
3. Install the mobile app on your mobile device

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Autel Robotics Starlink

View More by This Developer

By Autel Intelligent Technology Co., Ltd.

This app is only available on the App Store for iOS devices.
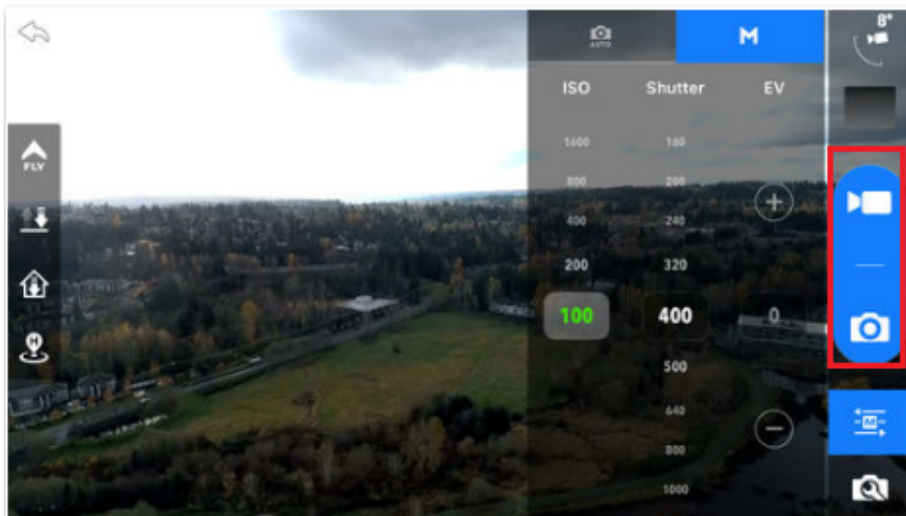
Description

With the Starlink App, it's easy to control your Autel Robotics X–Star or X–Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points.Learn the basics and more with Academy's tutorial videos, FAQs and manuals.

For Use With:
X–Star and X–Star Premium drones.

+ This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
- Enjoy an HD live video feed from your 4K camera
- Configure your aircraft's flight control settings
- Monitor aircraft flight data
- Adjust camera settings to create precision videos and still images
- Use Smart Pre–flight Check to ensure a safe flight
- Set autopilot features such as Follow, Orbit and Waypoints Points
- Learn with Academy– tutorial videos, FAQs and manuals

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

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., a smartphone with the Starlink app installed) via the at least one wireless network (e.g., a Wi-Fi network). On information and belief, if the accused product communicates with a smartphone or any other device over Wi-Fi network, then it must have 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 Starlink 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 Product) 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., product; a drone with a camera attachment) and the receiving device (e.g., a smartphone with the Starlink application installed) are disposed in a selectively paired relationship with one another (e.g., both devices are connected through 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.

Starlink App

- Adjust camera settings to capture videos or photos precisely how you want them to be.

- Configure your aircraft's flight control settings to best suit your preferences.

- Smart Pre-flight Check: Ensure every aspect of your aircraft is safe and ready for flight by running a pre-flight check.

- Enjoy an HD live video feed from your 4K camera even when the X-Star is a speck on the horizon.

https://www.autelrobotics.com/x-star-camera-drone/

Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink™** configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink™** app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)

- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink™** according to the following procedures.

➢ **To install Starlink™:**

   A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

   B. Download Starlink™ from the official website:

      1. Visit http://www.autelrobotics.com

      2. Download from **Support** > **Downloads** > **Software & App**

      3. Install the mobile app on your mobile device

https://3yn7uf15sq4l1ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Connecting the Mobile Device

The **X-Star/X-Star Premium** network is established when the aircraft, the remote controller and the mobile device are properly connected. This enables the mobile device to receive real-time flight data and video footage during flight so you can monitor flight maneuvers through the mobile app.

➤ **To connect the mobile device to the aircraft**

    1. Power up the remote controller and the aircraft successively.

    2. Connect your mobile device.

        X-Star:

        Turn on the WiFi connection on your mobile device, select **X-Star_×××××** from the WiFi list, and enter the default password **99999999**.

https://3yn7uf15sq4l1ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Autel Robotics Starlink

By Autel Intelligent Technology Co., Ltd.

This app is only available on the App Store for iOS devices.

View More by This Developer

Description

With the Starlink App, it's easy to control your Autel Robotics X-Star or X-Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points.Learn the basics and more with Academy's tutorial videos, FAQs and manuals.

For Use With:
X-Star and X-Star Premium drones.

  ⊞ This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
· Enjoy an HD live video feed from your 4K camera
· Configure your aircraft's flight control settings
· Monitor aircraft flight data
· Adjust camera settings to create precision videos and still images
· Use Smart Pre-flight Check to ensure a safe flight
· Set autopilot features such as Follow, Orbit and Waypoints Points
· Learn with Academy- tutorial videos, FAQs and manuals

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

    39.   The selectively paired relationship is at least partially based on the capturing

device and the receiving device (e.g., a smartphone with the Starlink application installed) are disposed in a selectively paired relationship with one another (e.g., both devices are connected through the same Wi-Fi network). For example, both devices are connected over the same Wi-Fi network and are within the effective signal range of the Wi-Fi network.

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.

Starlink App

- Adjust camera settings to capture videos or photos precisely how you want them to be.
- Configure your aircraft's flight control settings to best suit your preferences.
- Smart Pre-flight Check: Ensure every aspect of your aircraft is safe and ready for flight by running a pre-flight check.
- Enjoy an HD live video feed from your 4K camera even when the X-Star is a speck on the horizon.

https://www.autelrobotics.com/x-star-camera-drone/

◯ Preparing the Mobile Device

By connecting your mobile device to the aircraft, the X-Star mobile app **Starlink**™ configures your mobile device to perform as a First Person View (FPV) monitor and a ground station for remote piloting, flight configuration and waypoint navigation.

The **Starlink**™ app works on both iOS and Android smart phones and tablets. You can download it from our official website, Google Play or App Store.

Supported systems:

- iOS 8.0 or later (only compatible with iPhone 5 or later iPhone models)
- Android 4.0 or later

Installing the Mobile App – Starlink™

Download and install the **X-Star/X-Star Premium** mobile app **Starlink**™ according to the following procedures.

➢ **To install Starlink**™:

    A. Search in App Store/Google Play by entering the keyword **Starlink** (case insensitive) to download and install the app on your mobile device.

    B. Download Starlink™ from the official website:

        1. Visit http://www.autelrobotics.com

        2. Download from **Support** > **Downloads** > **Software & App**

        3. Install the mobile app on your mobile device

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf
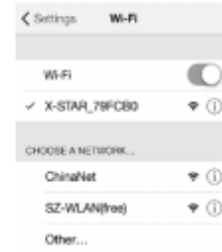
Connecting the Mobile Device

The **X-Star/X-Star Premium** network is established when the aircraft, the remote controller and the mobile device are properly connected. This enables the mobile device to receive real-time flight data and video footage during flight so you can monitor flight maneuvers through the mobile app.

➢ **To connect the mobile device to the aircraft**

1. Power up the remote controller and the aircraft successively.

2. Connect your mobile device.

   X-Star:

   Turn on the WiFi connection on your mobile device, select **X-Star_✕✕✕✕✕✕** from the WiFi list, and enter the default password **99999999**.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

Autel Robotics Starlink   View More by This Developer

By Autel Intelligent Technology Co., Ltd.

This app is only available on the App Store for iOS devices.

Description

With the Starlink App, it's easy to control your Autel Robotics X–Star or X–Star Premium drone. Your mobile device will act as the central monitor (HD Live View) for remote piloting control, aerial photographing and filming, and flight parameter tuning to achieve optimal flight performance. Monitor your aircraft data and use autopilot features such as Follow, Orbit and Waypoints Points.Learn the basics and more with Academy's tutorial videos, FAQs and manuals.

For Use With:
X–Star and X–Star Premium drones.

⊕ This app is designed for both iPhone and iPad

Free

Category: Utilities
Updated: Oct 06, 2017
Version: 2.0.5
Size: 114 MB
Languages: English, Simplified

Features:
· Enjoy an HD live video feed from your 4K camera
· Configure your aircraft's flight control settings
· Monitor aircraft flight data
· Adjust camera settings to create precision videos and still images
· Use Smart Pre–flight Check to ensure a safe flight
· Set autopilot features such as Follow, Orbit and Waypoints Points
· Learn with Academy– tutorial videos, FAQs and manuals

https://itunes.apple.com/us/app/autel-robotics-starlink/id1077641462?mt=8

Autopilot

The **Autopilot** function includes a series of smart flight modes that command your aircraft to fly in a specific pattern automatically, providing a carefree piloting experience for you. Tapping ([icon]) leads you to the Autopilot options below. The (⑦) button on the upper right corner grants access to the instructions for each mode:

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

- **Follow Mode**

  In Follow mode, the aircraft tracks you as you move with its nose pointing at you. The speed will depend on your moving speed but cannot exceed the flight speed you set in the app: **Settings** ([icon]) > **Flight Control Settings** ([icon]) > **Flight Speed**.

https://3yn7uf15sq411ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

✏ **NOTE**

- **Follow** mode is valid within 100 meters radius centering the mobile device. However, the aircraft will not turn its nose towards the mobile device when the horizontal distance between them is less than 3 meters.

- You can choose a location (your current position or the initial home point) for your aircraft to return to when **Failsafe** is activated in **Follow** mode.

❗ **IMPORTANT**

- **Orbit** and **Follow** modes cannot be activated when the aircraft is less than 10 meters high above the home point. Once you have activated **Follow** or **Orbit** mode, the altitude limit will be cancelled.

- In **Follow** or **Orbit** mode, if the GPS signal of your mobile device is too weak, the aircraft will switch to hover mode until the GPS signal quality becomes acceptable again. Follow/Orbit mode will be cancelled automatically after 15 seconds of poor GPS reception of the mobile device.

https://3yn7uf15sq4l1ivh8t2tfir5-wpengine.netdna-ssl.com/wp-content/uploads/2016/09/x-star-premium-manual.pdf

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: February 9, 2018   Respectfully submitted,

                                         /s/ Stamatios Stamoulis
                                         STAMATIOS STAMOULIS
                                         State Bar No.
                                         STAMOULIS & WEINBLATT LLC
                                         Two Fox Point Centre
                                         6 Denny Rd.
                                         Suite 307
                                         Wilmington, DE 19809
                                         (302) 999-1540
                                         stamoulis@swdelaw.com

                                         ATTORNEYS FOR PLAINTIFF