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Attorneys for Plaintiff
Remote Imaging Solutions LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

REMOTE IMAGING SOLUTIONS LLC Plaintiff, v. DJI TECHNOLOGY, INC. Defendant.	)))) Civil Action No. _____)) **JURY TRIAL DEMANDED**)))

COMPLAINT

For its Complaint, Plaintiff Remote Imaging Solutions LLC ("RIS"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. RIS is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.

2. Defendant DJI Technology, Inc. is a California company with, upon information and belief, a place of business located at 201 S. Victory Boulevard, Burbank, California 91502.

3. On February 8, 2019, RIS' licensing agent sent an e-mail to Defendant's specified e-mail address for "Intellectual Property" – dept-ip@dji.com – located on Defendant's website, *see* https://www.dji.com/contact, providing Defendant information regarding U.S. Patent No. 8,918,230 and Defendant's products accused of infringement herein.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

6. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

7. Venue is proper in this district pursuant to §§ 1391(b), (c) and 1400(b).

THE PATENT-IN-SUIT

8. On December 23, 2014, U.S. Patent No. 8,918,230 (the "'230 patent"), entitled "Teleoperation of Unmanned Ground Vehicle," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '230 patent is attached hereto as Exhibit A.

9. RIS is the assignee and owner of the right, title and interest in and to the '230 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

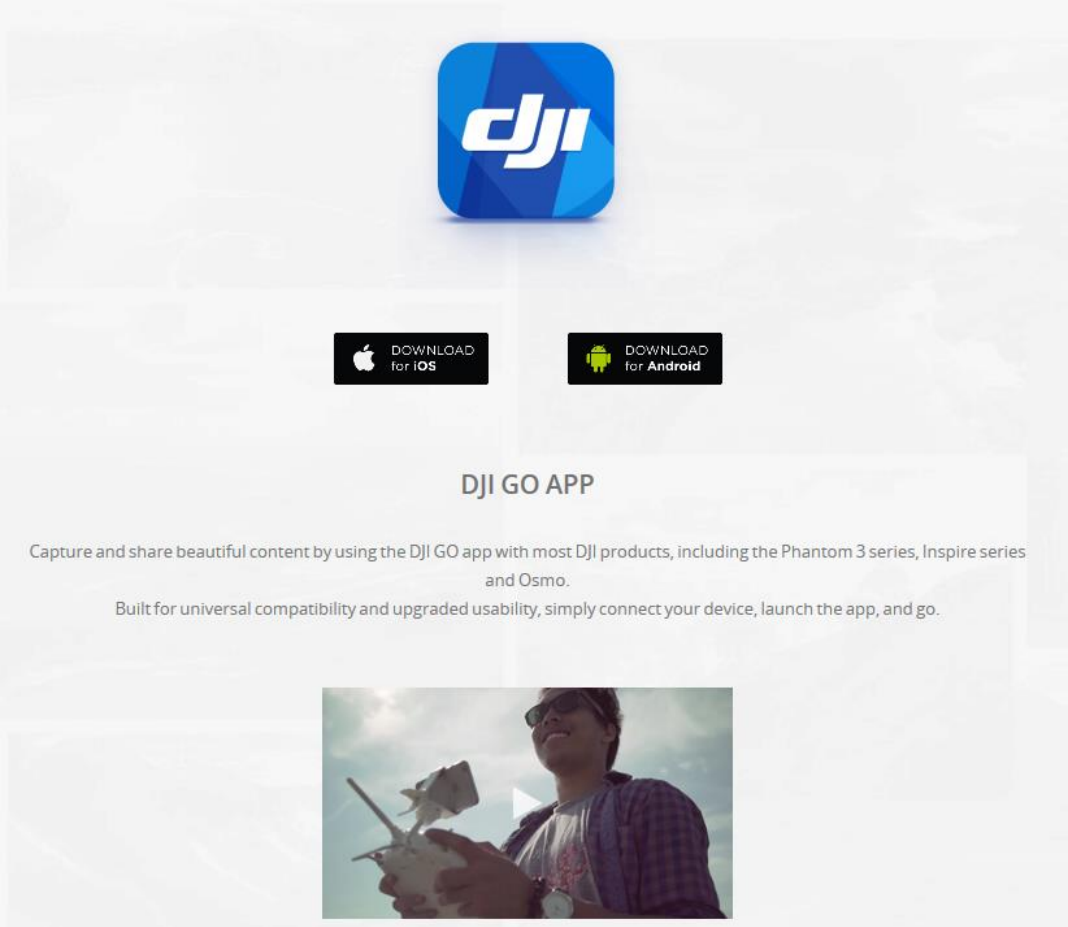
COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,918,230

10. RIS repeats and realleges the allegations of paragraphs 1 through 9 as if fully set forth herein.

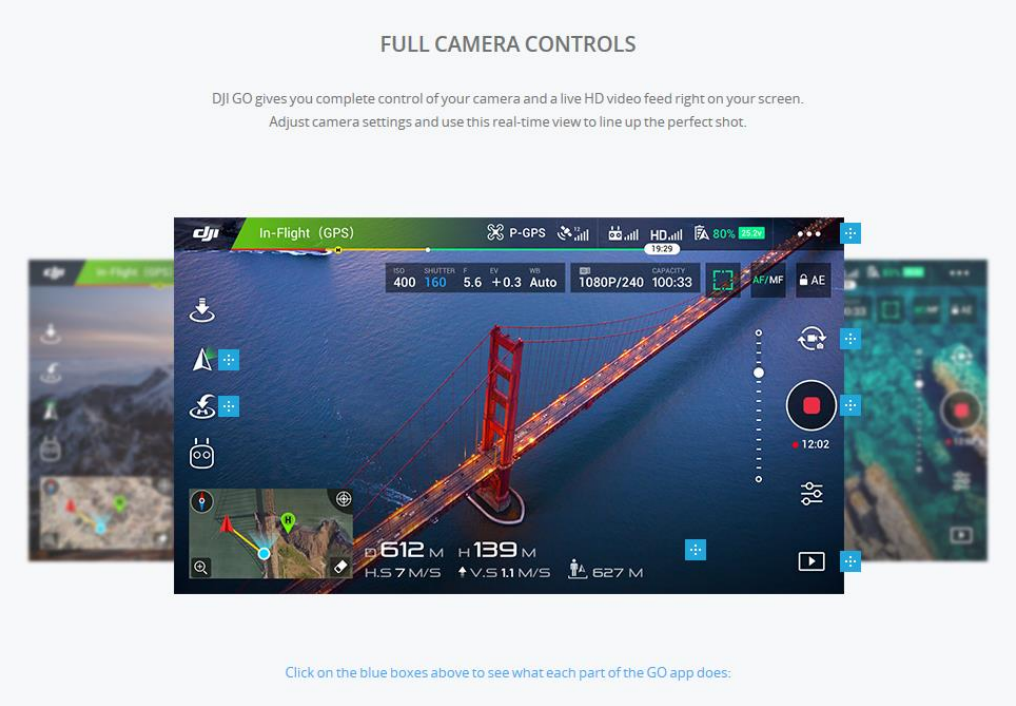
11. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 9 of the '230 patent by making, using, importing, offering for sale, and/or selling methods for controlling an unmanned vehicle, including, but not limited to, Inspire 1, Inspire 1Pro/Raw and Inspire 2 with their associated software (collectively, the "Accused Devices"), because each and every element is met either literally or equivalently.

12. Upon information and belief, Defendant used the Accused Devices via its internal use and testing in the United States, directly infringing one or more claims of the '230 patent.

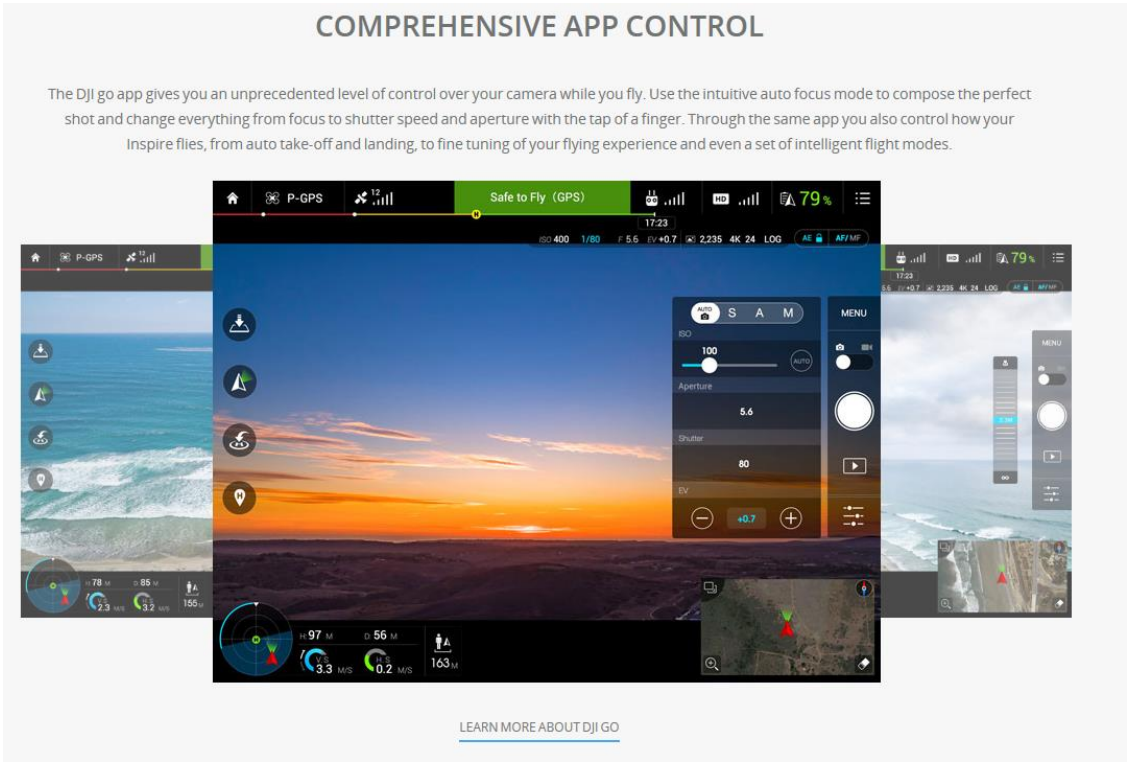
13. More specifically and upon information and belief, the Accused Devices are a computerized method for controlling an unmanned vehicle.



https://www.dji.com/inspire-1/app#sub-feature.



https://www.dji.com/inspire-1/app#autopilot.

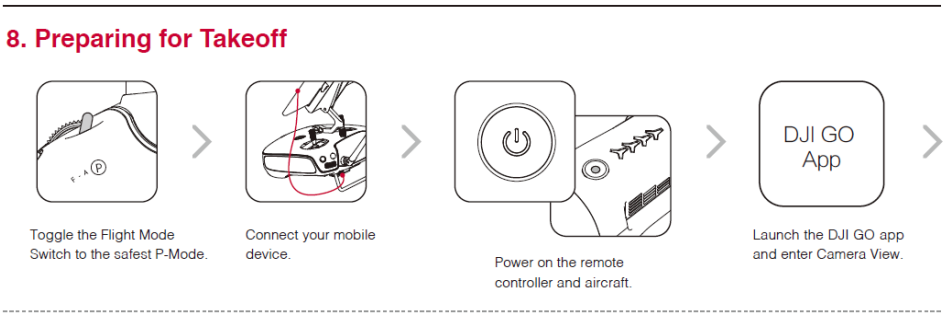


https://www.dji.com/inspire-1-pro-and-raw.

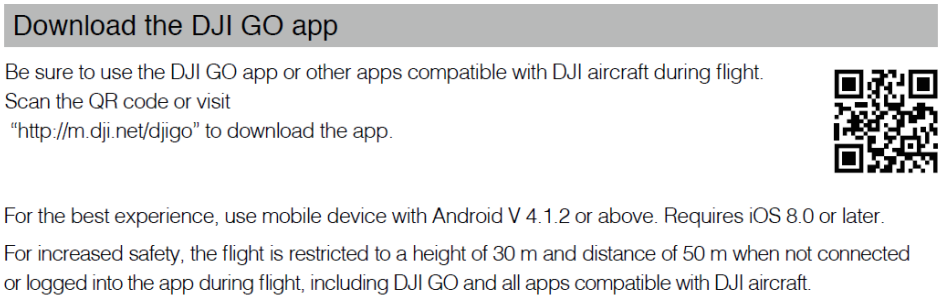
https://www.dji.com/inspire-2/features#subNavBar.

14. The DJI GO App is installed on a smart phone, and the smart phone receives a request (via the DJI GO app) to control the unmanned vehicle (e.g., the user selects "Go Fly" on the mobile device):

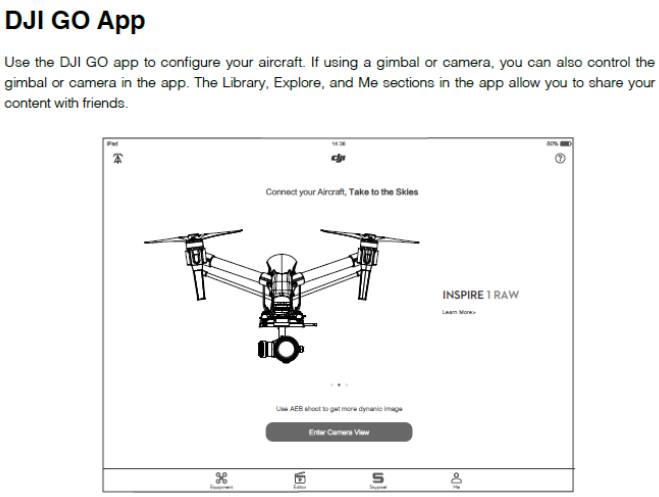
Inspire 1 Quick Start Guide ("Inspire 1 Quick Start") at p. 6 of 10 (available at http://dl.djicdn.com/downloads/INSPIRE+1+series/20170929+/INSPIRE_1_QSG_V2.2_EN.pdf).



Id. at p. 8 of 10.

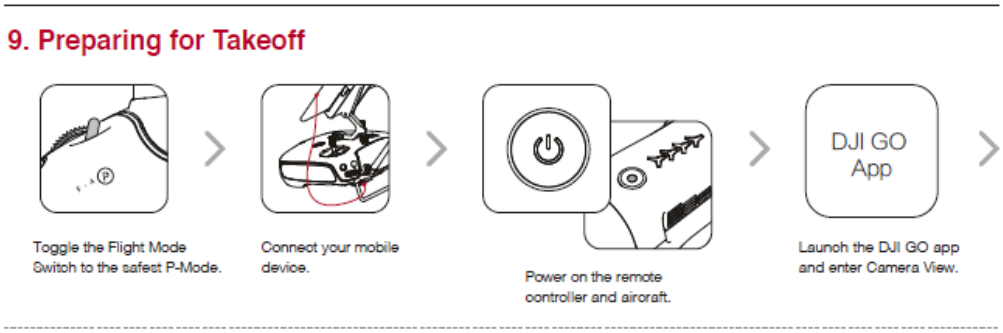


Inspire 1 Raw User Manual ("Inspire 1 Raw Manual") at p. 3 (available at https://dl.djicdn.com/downloads/INSPIRE+1+series/20171221/INSPIRE_1_RAW_User_Manual_EN.pdf).

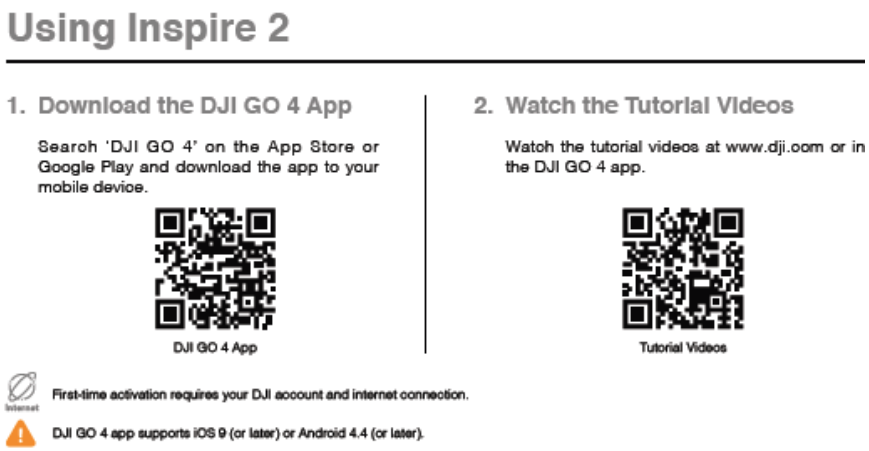


*Id.*at p. 59.

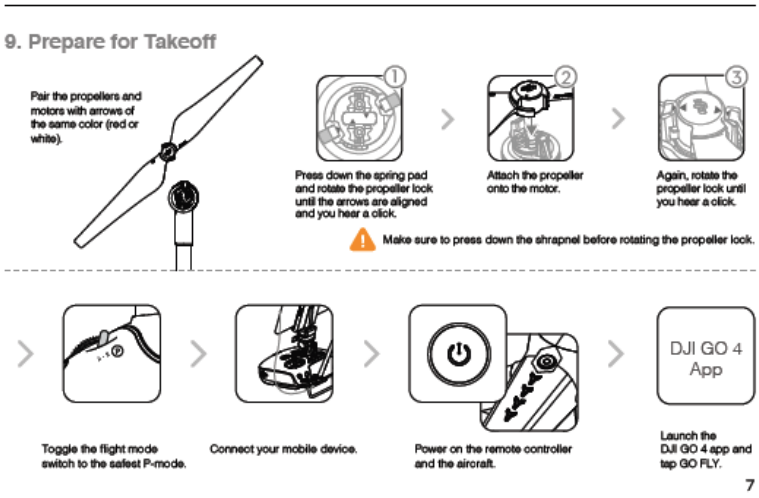
Inspire 1 PRO Quick Start Guide ("Inspire 1 PRO Quick Start") at p. 6 of 10 (available at http://dl.djicdn.com/downloads/INSPIRE+1+series/20170929+/INSPIRE_1_PRO_QSG_V2.2_EN.pdf).



Id. at p. 8 of 10.

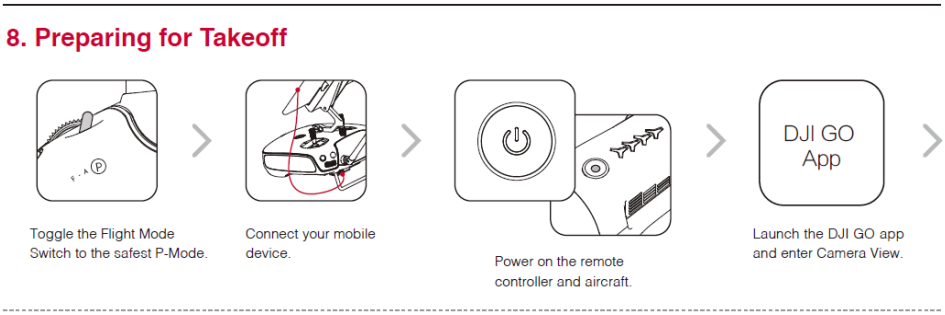


Inspire 2 Series Quick Start Guide ("Inspire 2 Quick Start Guide") at p. 5 (available at https://dl.djicdn.com/downloads/inspire_2/20180428/Inspire_2_Series_QSG_Multi.pdf).

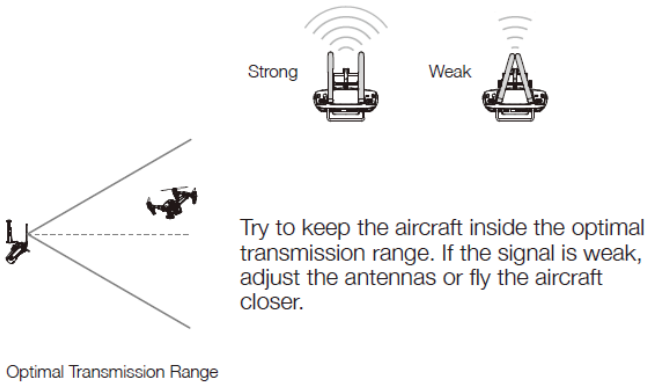


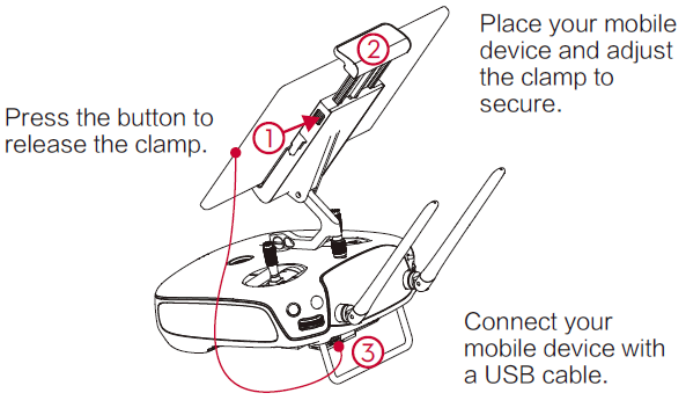
Id. at p. 7.

15. The smart phone establishes wireless communication with the unmanned vehicle (e.g., the DJI GO app communicates wirelessly to the aircraft via the transmitter).



Inspire 1 Quick Start at p. 8 of 10.

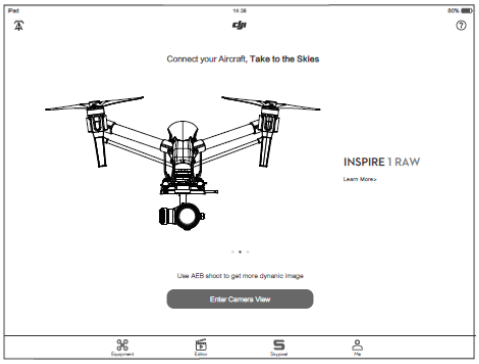




Id. at p. 7 of 10.

DJI GO App

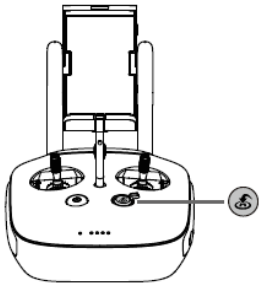
Use the DJI GO app to configure your aircraft. If using a gimbal or camera, you can also control the gimbal or camera in the app. The Library, Explore, and Me sections in the app allow you to share your content with friends.



Inspire 1 RAW Manual at p. 59.

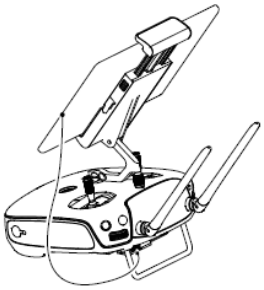
RTH button

Press and hold this button to start the Return to Home (RTH) procedure. The LED around the RTH Button will blink white to indicate the aircraft is entering RTH mode. The aircraft will then return to the last recorded Home Point. Press this button again to cancel the RTH procedure and regain the control of the aircraft.



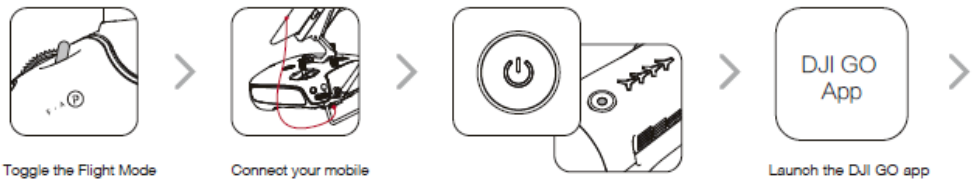
Connecting Mobile Device

Tilt the Mobile Device Holder to the desired position. Press the button on the side of the Mobile Device Holder to release the clamp, and then place your mobile device into the clamp. Adjust the clamp to secure your mobile device. Then connect your mobile device to the remote controller with a USB cable. Plug one end of the cable into your mobile device, and the other end into the USB port on the back of the remote controller.



Id. at p. 31.

9. Preparing for Takeoff



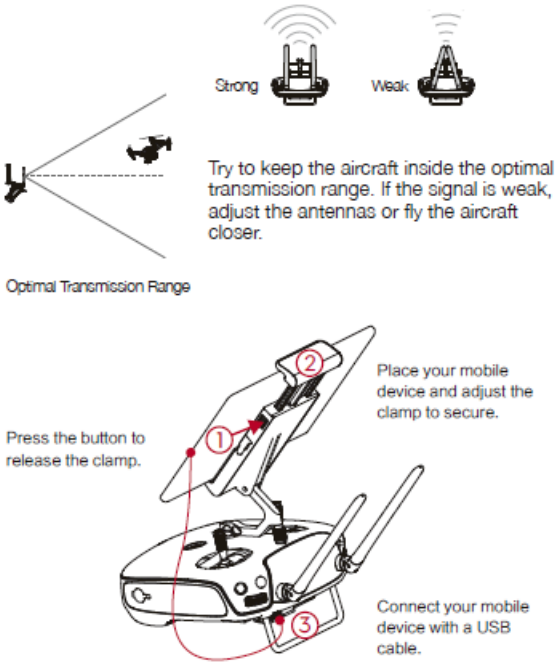
Toggle the Flight Mode Switch to the safest P-Mode.

Connect your mobile device.

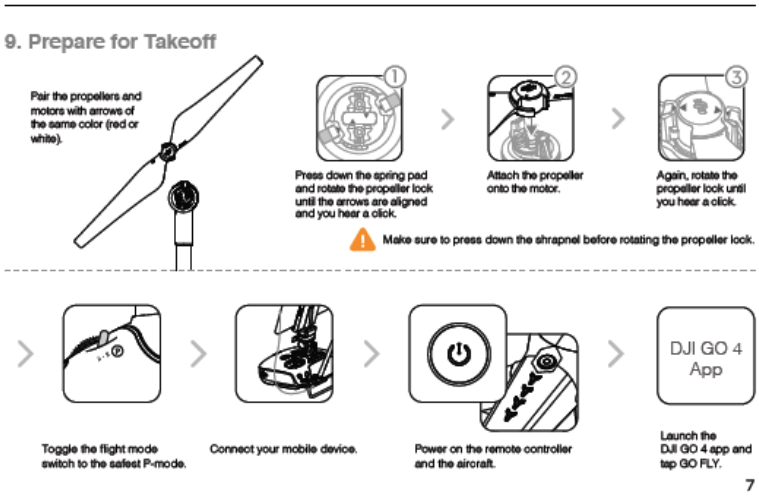
Power on the remote controller and aircraft.

Launch the DJI GO app and enter Camera View.

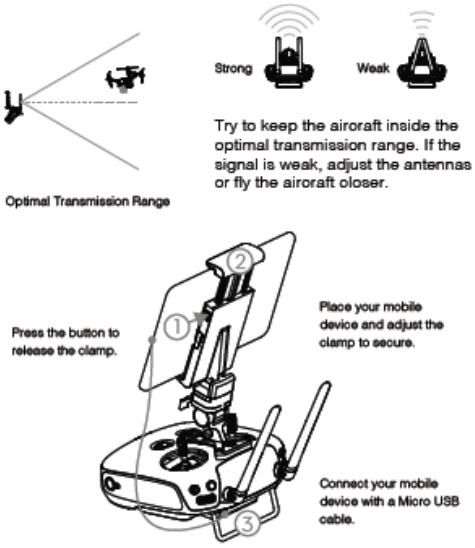
Inspire 1 PRO Quick Start at p. 8 of 10.



Id. at p. 7 of 10.



Inspire 2 Quick Start Guide at p. 7.



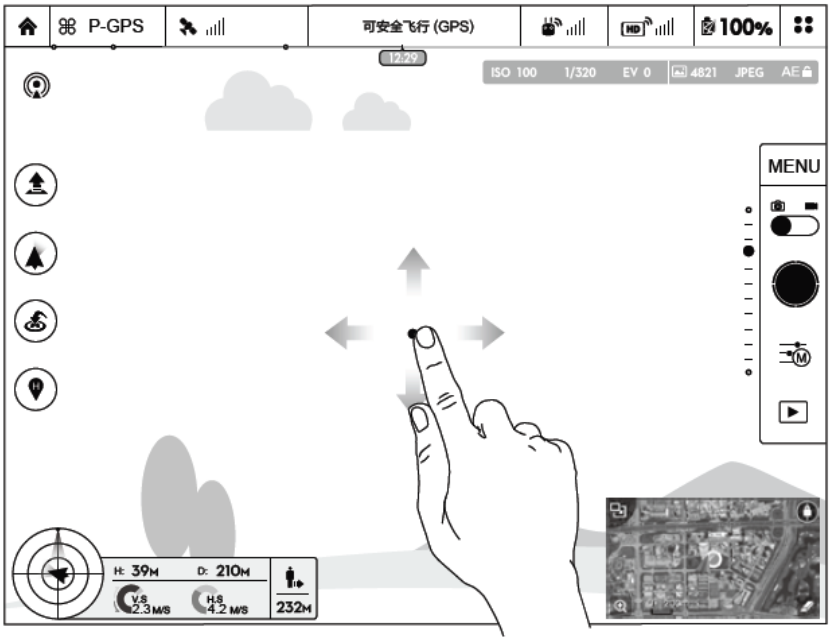
*Id.*at p. 6.

16. The smart phone communicates with the unmanned vehicle.

Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

1. Launch DJI GO app, enter "Camera" page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.

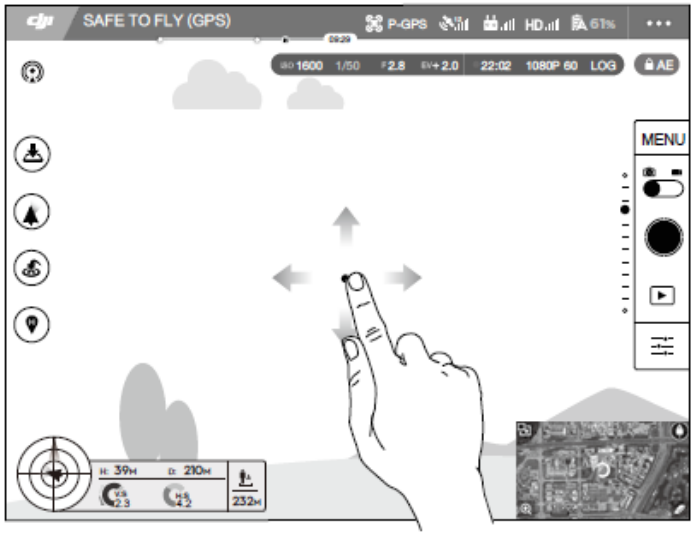


Inspire 1 User Manual ("Inspire 1 Manual") at p. 38 (available at https://dl.djicdn.com/downloads/INSPIRE+1+series/20171221/INSPIRE_1_V2.0_User_Manual_EN.pdf).

Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

1. Launch DJI GO app, enter "Camera" page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.

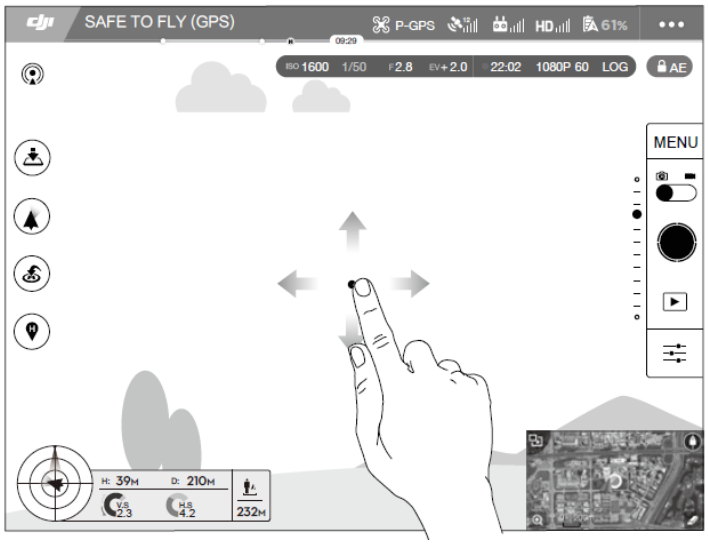


Inspire 1 RAW Manual at p. 45.

Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

1. Launch DJI GO app, enter "Camera" page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.



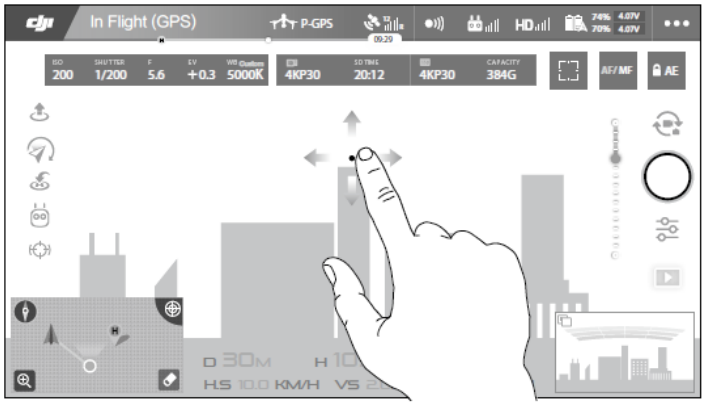
Inspire 1 PRO User Manual ("Inspire 1 PRO Manual") at p. 41 (available at https://dl.djicdn.com/downloads/INSPIRE+1+series/20171221/INSPIRE_1_PRO_User_Manual_EN.pdf).

Using DJI GO 4 App to Control Gimbal

Follow the steps below to use DJI GO 4 app to control the gimbal orientation:

1. Launch DJI GO 4 app, enter camera page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.

Inspire 2 Series User Manual ("Inspire 2 Manual") at p. 48 (available at https://dl.djicdn.com/downloads/inspire_2/20180910/INSPIRE_2_SERIES_User_Manual_EN.pdf).

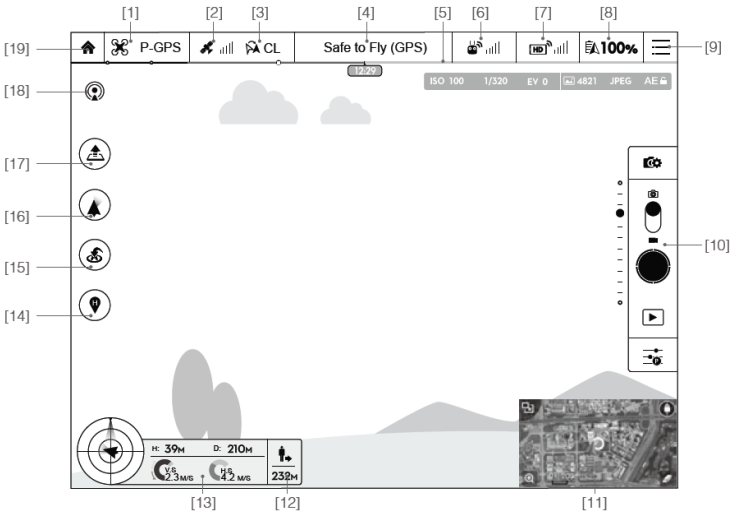


Id. at p. 49.

17. The smart phone receives a video stream from the Accused Devices' cameras.

Camera

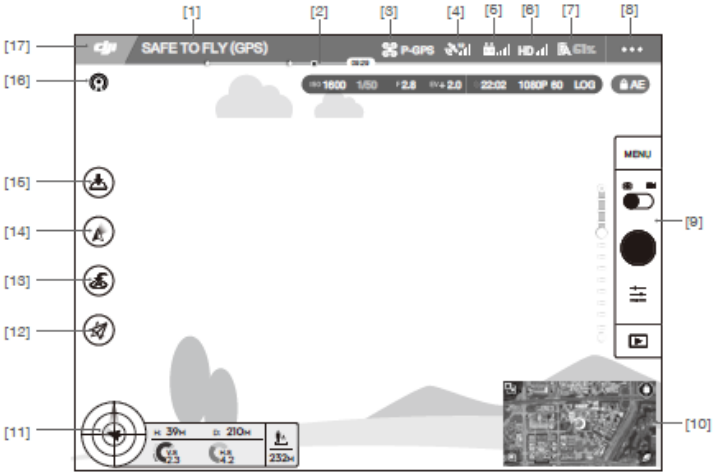
The Camera page contains a live HD video feed from the Inspire 1's camera. You can also configure various camera parameters from the Camera page.



Inspire 1 Manual at p. 41.

Equipment

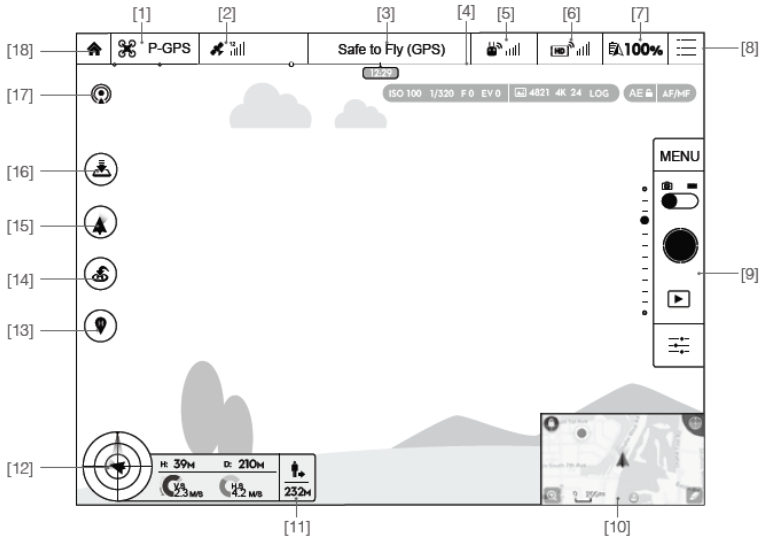
On the Equipment page, you can enter Camera View, visit the Academy or view your flight records. Camera View.



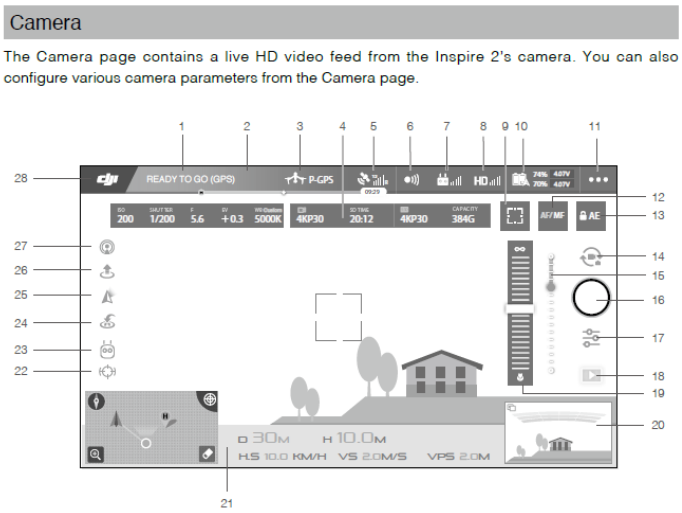
Inspire 1 RAW Manual at p. 59.

Camera

The Camera page contains a live HD video feed from the Inspire 1 Pro's camera. You can also configure various camera parameters from the Camera page.

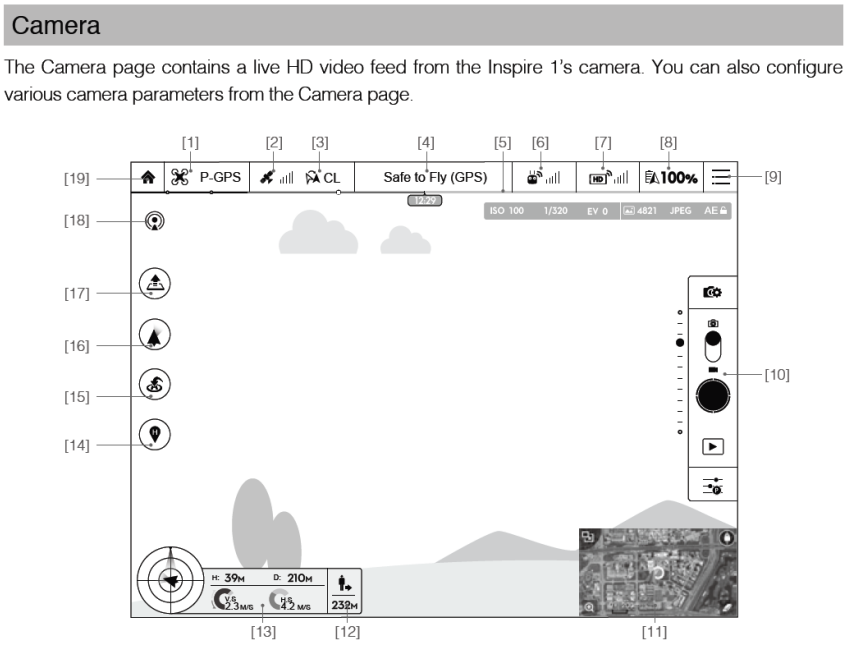


Inspire 1 PRO Manual at p. 44.



Inspire 2 Manual at p. 53.

18. The video stream and vehicle controls are displayed on the smart phone's touch sensitive display screen.



Inspire 1 Manual at p. 41.

[1] Flight Mode

: The text next to this icon indicates the current flight mode.
Tap to configure the MC (Main Controller) Settings. These settings allow you to modify flight limits and set the gain values.

[2] GPS Signal Strength

: This icon shows the current strength of GPS signals. Green bars indicate adequate GPS strength.

[3] IOC Settings

CL : This icon displays the IOC setting when the aircraft has entered F-mode. Tap to view the IOC settings menu and select the desired IOC setting.

[4] System Status

Safe to Fly (GPS) : This icon indicates the current aircraft system status and GPS signal strength.

[5] Battery Level Indicator

: The battery level indicator provides a dynamic display of the battery level. The colored zones on the battery level indicator represent the power levels needed to carry out different functions.

[6] Remote Controller Signal

: This icon shows the strength of remote controller's signal.

[7] HD Video Link Signal Strength

HD : This icon shows the strength of the HD video downlink connection between the aircraft and the remote controller.

[8] Battery Level

100%: This icon shows the current battery level.

Tap to view the battery information menu, set the various battery warning thresholds, and view the battery warning history.

[9] General Settings

: Tap this icon to view the General Settings page. From this page, you can set flight parameters, reset the camera, enable the quick view feature, adjust the gimbal roll value, and toggle the flight route display.

[10] Camera Operation Bar

Shutter and Recording Settings

: Tap to enter various camera value settings, including color space for the recording, resolution of the videos, image size and so on.

Shutter

: Tap this button to take a single photo. Press and hold this button to select single shot, triple shot or time-lapsed shooting modes.

*Id.*at p. 42.

Record

: Tap once to start recording video, then tap again to stop recording. You can also press the Video Recording Button on the remote controller, which has the same functionality.

Playback

: Tap to enter the playback page. You can preview photos and videos as soon as they are captured.

Camera Settings

: Tap to set ISO, shutter and auto exposure values of the camera.

[11] Map

Display the flight path of the current flight. Tap to switch from the Camera GUI to the Map GUI.

[12] Aircraft Distance

: The distance of the aircraft from the Home Point. When the aircraft is near the ground, this icon will change to to display the height the Vision Position System's sensors from the ground.

[13] Flight Telemetry

The Vision Positioning Status icon is highlighted when the Vision Positioning is in operation.

Flight attitude is indicated by the flight attitude icon.

(1) The red arrow shows which direction the aircraft is facing.

(2) Light blue and dark blue areas indicate pitch.

(3) The angle of the boundary between the light blue and dark blue areas indicates the roll angle.

[14] Home Point Settings

: Tap this button to reset the current home point. You may choose to set the aircraft take-off location, the remote controller's current position, or the aircraft's current position as the Home Point.

[15] Return to Home (RTH)

: Initiate RTH home procedure. Tap to have the aircraft return to the latest home point.

[16] Gimbal Operation Mode

Refer to "Gimbal Operation Mode" P38 for more information.

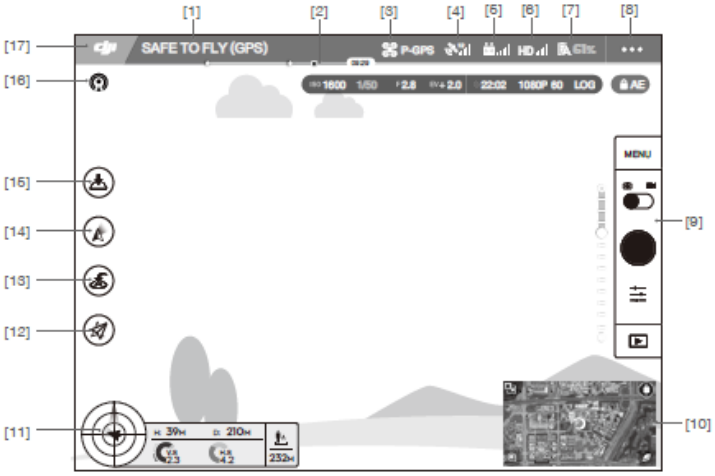
[17] Auto Takeoff/Landing

/ : Tap to initiate auto takeoff or landing.

Id. at p. 43.

Equipment

On the Equipment page, you can enter Camera View, visit the Academy or view your flight records. Camera View.



Inspire 1 RAW Manual at p. 59.

[1] System Status

SAFE TO FLY (GPS) : Indicates the current aircraft system status and GPS signal strength.

[2] Battery Level Indicator

: Describes the battery level of the aircraft according to its immediate status. The colored zones represent the various stages of battery level. When the battery level drops to a certain stage, the system will prompt the user to take the appropriate action.

[3] Flight Mode

: The text next to this icon indicates the current flight mode.
Tap this icon to configure the Main Controller Settings, to change the flight limits and set the gain values.

[4] GPS Signal Strength

: Shows the current GPS signal strength. White bars indicate adequate GPS strength.

[5] Remote Controller Signal

: Shows the signal strength of the remote controller.

[6] HD Video Link Signal Strength

HD : Shows the signal strength of the HD video downlink between the aircraft and the remote controller.

[7] Battery Level

61% : Shows the current battery level.
Tap this icon to view the battery information menu where you can set the battery warning thresholds and view the battery log.

[8] General Settings

••• : Tap this icon to view General Settings where you can set the flight parameters, and enable the Flight Route display.

[9] Camera Operation Bar

This bar will be displayed when using a Zenmuse X3, X5 series or XT gimbal with camera.

Shutter and Recording Settings

MENU : Tap this icon to enter various camera value settings including the Color Mode, Video Size, and Image Size.

Shutter

: Tap this button to take a single photo. Press and hold this button to switch between Single Shot, Triple Shot and Timed Shot modes.

Record

: Tap once to start recording video, then tap again to stop recording. You can also press the Video Recording Button on the remote controller.

Id. at p. 60.

Playback

▶: Tap this icon to play back photos and videos after they are captured.

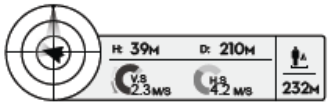
Camera Settings

: Tap this icon to set the ISO, Shutter Speed and Exposure Value of the camera.

[10] Mini Map

Displays the flight path of the current flight. Tap the Mini Map to switch between Camera View and Map View.

[11] Flight Telemetry



Flight Attitude and Radar Function:

The aircraft's flight attitude is indicated by the target-like icon.
(1) The red arrow shows which direction the aircraft is facing.
(2) The ratio of the grey area to the blue area indicates the aircraft's pitch.
(3) The horizontal level of the grey area indicates the aircraft's roll angle.

Flight Parameters:

Altitude: Vertical distance from the Home Point.
Distance: Horizontal distance from the Home Point.
Vertical Speed: Movement speed across a vertical distance.
Horizontal Speed: Movement speed across a horizontal distance.

Aircraft Distance:

The horizontal distance between the aircraft and the operator.

[12] Intelligent Flight Mode

: This icon displays the Intelligent Flight Mode settings when the aircraft has entered F-mode. Tap to select one of the Intelligent Flight Modes.

[13] Return-to-Home (RTH)

: Initiate RTH home procedure. Tap to have the aircraft return to the latest Home Point.

Id. at p. 61.

[14] Gimbal Operation Mode

This icon will be displayed when using a DJI gimbal (or camera). Tap to select a mode or re-align the gimbal.

Follow Mode	The gimbal's orientation is aligned with the aircraft's nose. One user alone can control the pitch motion of the gimbal, but a second operator is required to control the yaw motion using a second remote controller.
FPV Mode	The gimbal will lock to the movement of the aircraft to provide a First-Person-View flying experience.
Free Mode	The gimbal's motion is independent of the aircraft's orientation. One user alone can control the pitch motion of the gimbal, but a second user is required to control the yaw motion using a second remote controller.
Re-alignment	Re-align the yaw angle of the gimbal with that of the aircraft. The pitch angle remains unchanged during the re-alignment.

[15] Auto Takeoff/Landing

/ : Tap to initiate auto takeoff or landing.

[16] Livestream

: This icon indicates the current video feed is being broadcast live on YouTube. Ensure that mobile data service is available on your mobile device.

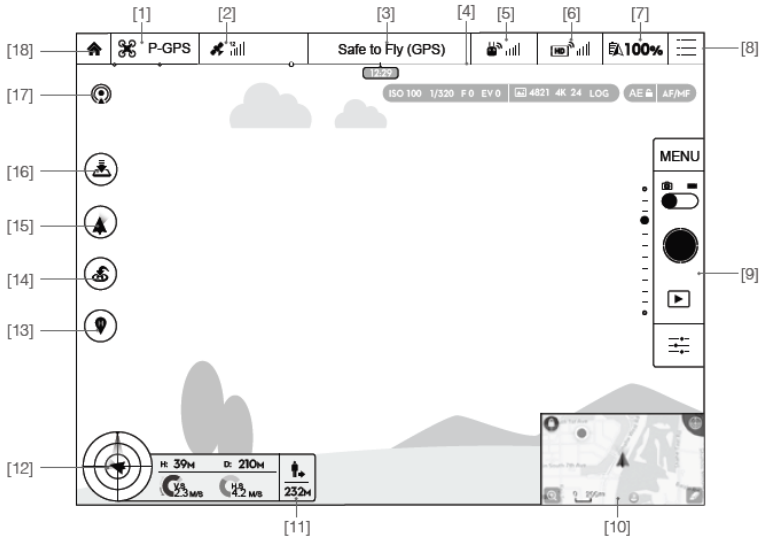
[17] Back

: Tap this icon to return to the main menu.

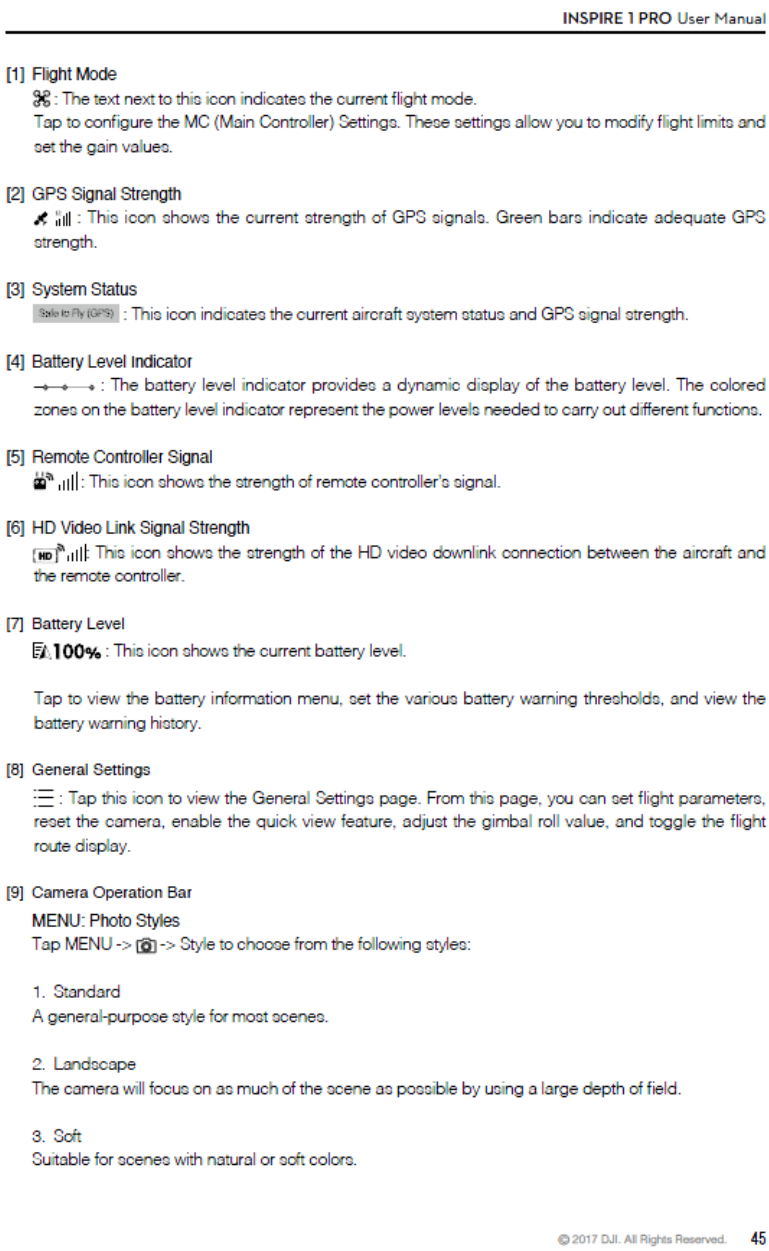
Id. at p. 62.

Camera

The Camera page contains a live HD video feed from the Inspire 1 Pro's camera. You can also configure various camera parameters from the Camera page.



Inspire 1 PRO Manual at p. 44.



INSPIRE 1 PRO User Manual

[1] Flight Mode

: The text next to this icon indicates the current flight mode.
Tap to configure the MC (Main Controller) Settings. These settings allow you to modify flight limits and set the gain values.

[2] GPS Signal Strength

: This icon shows the current strength of GPS signals. Green bars indicate adequate GPS strength.

[3] System Status

Safe to Fly (GPS) : This icon indicates the current aircraft system status and GPS signal strength.

[4] Battery Level Indicator

: The battery level indicator provides a dynamic display of the battery level. The colored zones on the battery level indicator represent the power levels needed to carry out different functions.

[5] Remote Controller Signal

: This icon shows the strength of remote controller's signal.

[6] HD Video Link Signal Strength

HD : This icon shows the strength of the HD video downlink connection between the aircraft and the remote controller.

[7] Battery Level

100% : This icon shows the current battery level.

Tap to view the battery information menu, set the various battery warning thresholds, and view the battery warning history.

[8] General Settings

: Tap this icon to view the General Settings page. From this page, you can set flight parameters, reset the camera, enable the quick view feature, adjust the gimbal roll value, and toggle the flight route display.

[9] Camera Operation Bar

MENU: Photo Styles
Tap MENU -> -> Style to choose from the following styles:

1. Standard
A general-purpose style for most scenes.

2. Landscape
The camera will focus on as much of the scene as possible by using a large depth of field.

3. Soft
Suitable for scenes with natural or soft colors.

 45

Id. at p. 45.

4. Custom
Sharpness: -3 to +3
Contrast: -3 to +3
Saturation: -3 to +3

MENU: White Balance
Tap MENU -> [camera] ->White Balance to choose from the following modes:

1. Auto
The camera adjusts the white balance automatically.

2. Sunny / Cloudy / Incandescent / Neon
Choose one of these modes if natural-looking colors cannot be achieved through photo styles.

3. Custom (2000K~10000K)
Set a value between 2000K and 10000K to compensate for a specific light source.

MENU: List of Settings

Photo	
Shooting Modes	Single shoot, Burst Mode, AEB(3/5 bracketed frames), Time-lapse
Image Format	JPEG, DNG, JPEG+DNG
Image Size	4:3, 16:9
White Balance	Auto, Sunny, Cloudy, Incandescent, Neon, Custom (2000K~10000K)
Style	Standard, Landscape, Soft, Custom (Sharpness/Contrast/ Saturation)
Color	LOG, None, Vivid, Black White, Art, Film, Beach, Dream, Classic, Nostalgia
Video	
Video Size	UHD:4K (4096×2160) 24/25p, 4K (3840×2160) 24/25/30p, 2.7K (2704×1520) 24/25/30p; FHD:1920×1080 24/25/30/48/50/60p
Video Format	MOV, MP4
NTSC/ PAL	PAL, NTSC
White Balance	Auto, Sunny, Cloudy, Incandescent, Neon, Custom (2000K~10000K)
Style	Standard, Landscape, Soft, Custom (Sharpness/Contrast/ Saturation)
Color	LOG, None, Vivid, Black White, Art, Film, Beach, Dream, Classic, Nostalgia
General	
Quick Preview	Off, 1s, 2s, 3s, 4s, 5s, 6s, 7s, 8s, 9s, and 10s
Anti-Flicker	Auto, 60Hz, and 50Hz
Show Grid	Off, Grid Line, Grid + Diagonal, Center Point
File Index Mode	Reset, Continuous
Others	Show Histograms, Video Captions, Lens Profile, Reset Camera Settings, Format SD Card

Id. at p. 46.

: Taking Photos
Slide the Photo/Video Switch to the position. Tap the button or the shutter button on the remote controller to take a single photo. Choose from one of the shooting modes by tapping "MENU" -> -> Photo.
1. Burst Mode
Take 3, 5, or 7 shots in a row.

2. AEB (Auto Exposure Bracketing)
Take 3 or 5 bracketed frames with ±0.7EV steps for exposure compensation.

3. Time-lapse
Take photos in 5, 7, 10, 20 or 30 second intervals.

: Recording Videos
Slide the Photo/Recording Switch to the position. Tap the icon or the Record Button on the remote controller to start or stop recording video.

: Exposure Modes
Tap to choose from the following exposure modes:
1. AUTO
The shutter speed and aperture are set automatically to obtain the correct exposure.

2. S (Shutter Priority)
Set your desired shutter speed, while the camera chooses the aperture automatically. This mode is ideal for freezing action, creating motion blur or low-light shots.

3. A (Aperture Priority)
Set your desired aperture, while the camera chooses the shutter speed automatically. This mode provides a wider depth of field and can be used to blur out backgrounds.

4. M (Manual Exposure)
In general, increase the ISO for low light environments, and decrease the ISO if the surrounding is very bright.

: Playback
Tap in the DJI GO app or press the Playback Button on the remote controller to review photos and videos that you have captured. Press the same button again to return to capturing images.

[10] Map
Display the flight path of the current flight. Tap to switch from the Camera GUI to the Map GUI.

Id. at p. 47.

[11] Aircraft Distance

: The distance of the aircraft from the Home Point. When the aircraft is near the ground, this icon will change to to display the height the Vision Position System's sensors from the ground.

[12] Flight Telemetry

Flight attitude is indicated by the flight attitude icon.
(1) The red arrow shows which direction the aircraft is facing.
(2) Light blue and dark blue areas indicate pitch.
(3) The angle of the boundary between the light blue and dark blue areas indicates the roll angle.

[13] Home Point Settings

: Tap this button to reset the current home point. You may choose to set the aircraft take-off location, the remote controller's current position, or the aircraft's current position as the Home Point.

[14] Return to Home (RTH)

: Initiate RTH home procedure. Tap to have the aircraft return to the latest home point.

[15] Gimbal Operation Mode

Refer to "Gimbal Operation Mode" P42 for more information.

[16] Auto Takeoff/Landing

/ : Tap to initiate auto takeoff or landing.

[17] Livestream

: Livestream icon indicates the current video feed is broadcasting live on YouTube. Be sure the mobile data service is available on the mobile device.

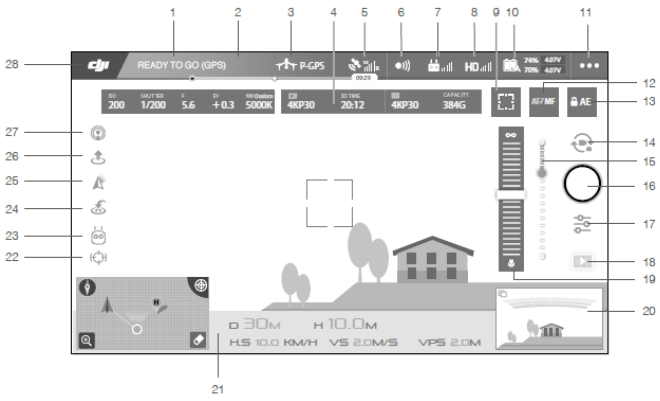
[18] Back

: Tap to return to the main GUI.

*Id.*at p. 49.

Camera

The Camera page contains a live HD video feed from the Inspire 2's camera. You can also configure various camera parameters from the Camera page.



Inspire 2 Manual at p. 53.

1. System Status
READY TO GO (GPS) : This icon indicates aircraft flight status and various warning messages.

2. Battery Level Indicator
: The battery level indicator provides a dynamic display of the battery level. The colored zones on the battery level indicator represent the power levels needed to carry out different functions.

3. Flight Mode
: The text next to this icon indicates the current flight mode.
Tap to configure the MC (Main Controller) Settings. These settings allow you to modify flight limits and set gain values.

4. Camera Parameters
Displays camera settings parameters and capacity.

(1) Tap 5000K to set the white balance parameters.
(2) Tap 4KP30 20:12 4KP30 384G to set the photo and video parameters.

5. GPS Signal Strength
: Shows the current GPS signal strength. White bars indicate adequate GPS strength.

6. Obstacle Sensing Function Status
: Tap into this button to enable or disable features provided by the Vision System.

7. Remote Controller Signal Strength
: This icon shows the strength of the remote controller signal.

8. HD Video Link Signal Strength
HD : This icon shows the strength of the HD video downlink connection between the aircraft and the remote controller.

9. Focus/Metering Button
/ : Tap to switch between focus and metering mode. Tap to select object for focusing or metering.

10. Battery Level
74% 4.07V
70% 4.07V : This icon shows the current battery level.
Tap to view the battery information menu, set the various battery warning thresholds, and view the battery warning history.

11. General Settings
••• : Tap to enter general setting menu for setting metrics, enabling livestream, display flight routes and so on.

12. AF/MF
AF/ MF : Tap to switch the focus mode.

13. Auto Exposure Lock
AE : Tap to lock the exposure value.

Id. at p . 54.

14. Photo/Video Button
: Tap to switch between photo and video recording modes.

15. Gimbal Slider
: Displays the pitch of the gimbal.

16. Shoot / Record Button
/ : Tap to start shooting photos or recording video.

17. Camera Settings
: Tap to set ISO, shutter and auto exposure values of the camera.

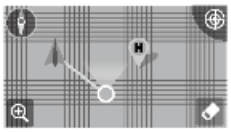
18. Playback
: Tap to enter the playback page and preview photos and videos as soon as they are captured.

19. Manual Focus
Only effective in MF mode.

20. FPV
FPV is only available on tablets. Pinch to zoom in or out of the window.

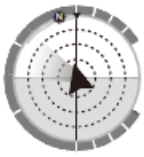
: Red bars are displayed when obstacles are close to the aircraft. Orange bars are displayed when obstacles are in detection range.
: Tap to zoom in on the FPV window and move it to the middle of the screen.

21. Flight Telemetry



D 30M H 10.0M
HS 10.0 KM/H VS 2.0M/S VPS 2.0M

(1) Tap to switch to the map view.
(2) Flight Attitude and Radar Function:



• The red arrow shows which direction the aircraft is facing.
• The ratio of the gray area to the blue area indicates the aircraft's pitch.
• The horizontal level of the gray area indicates the aircraft's roll angle.

*Id.*at p. 55.

• A blue line indicates the current position of the gimbal's tilt motor.
• The outermost grey circle displays the current power capacity.

(3) Flight Parameters:
Altitude: Vertical distance from the Home Point.
Distance: Horizontal distance from the Home Point.
Vertical Speed: Movement speed across a vertical distance.
Horizontal Speed: Movement speed across a horizontal distance.

(4) Aircraft Distance:
The horizontal distance between the aircraft and the operator.

22. Spotlight Pro
:Tap to use the Spotlight Pro function.

23. Intelligent Flight Mode
: Display the current mode. Tap to select Intelligent Flight Mode.

24. Smart RTH
: Initiate RTH home procedure. Tap to have the aircraft return to the last recorded home point.

25. Gimbal Working Modes
Follow mode, free mode and reset mode are included.

26. Auto Takeoff/Landing
/ : Tap to initiate auto takeoff or landing.

27. Livestream
: This icon indicates the current video feed is being broadcast live on YouTube. Ensure that mobile data service is available on your mobile device.

28. Back
: Tap this icon to return to the main menu.

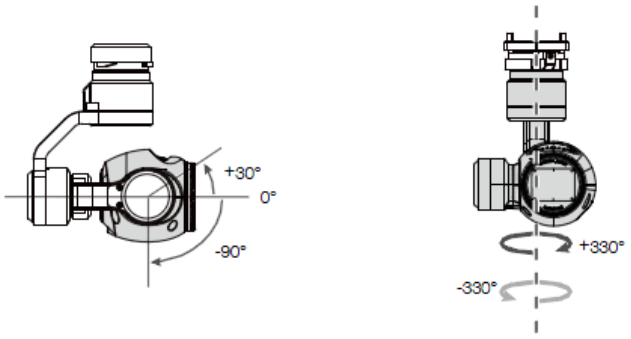
Id. at p. 56.

19. The video stream and vehicle controls are displayed on the smart phone's touch sensitive display screen.

Gimbal

Gimbal Profile

The 3-axis Gimbal provides a steady platform for the attached camera, allowing you to capture stabilized images and video. The Gimbal can tilt the camera up to 120 degrees and rotate 360 degrees.



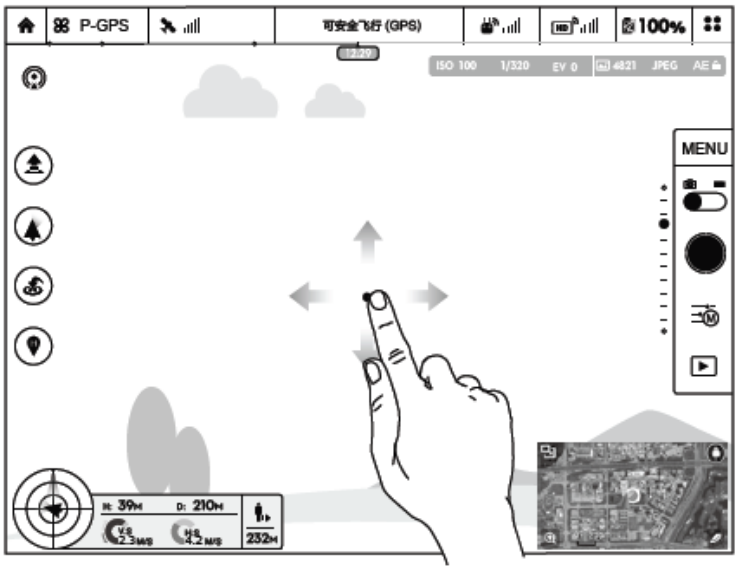
Use the gimbal dial on the remote controller to control pitch movement of the camera by default. Note that you cannot control the pan motion of the camera by default. Enable the "Master-and-Slave" mode and set the remote controller to "Slave" state if you wish to control both the pan and pitch movement of the camera.

Inspire 1 Manual at p. 37.

Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

1. Launch DJI GO app, enter "Camera" page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.



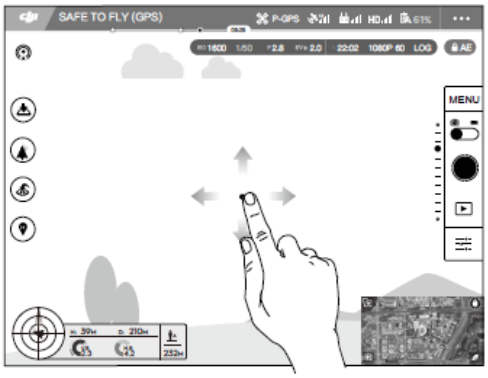
Id. at p. 38.

Press C1 or C2 button to switch from pitch mode to yaw mode. You may use the gimbal dial to pan the gimbal under yaw mode. Press C1 or C2 again to exit yaw mode.
While pressing the C1 button, turn the gimbal dial to focus the X5 camera manually.
While pressing the C2 button, turn the camera settings dial to fine tune the roll axis of the gimbal.

Using DJI GO App to Control Gimbal

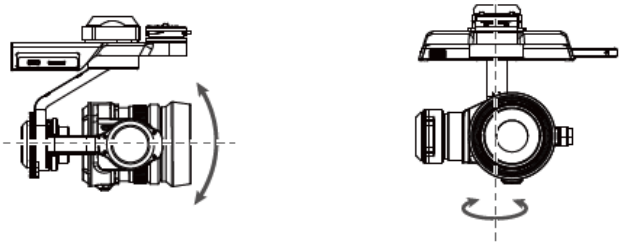
Follow the steps below to use DJI GO app to control the gimbal orientation:

1. Launch DJI GO app, enter "Camera" page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.



Gimbal Operation Modes

Three Gimbal operation modes are available. Switch between the different operation modes on the Camera page of the DJI GO App. Note that your mobile device must be connected to the remote controller for changes to take effect. Refer to the table below for details:

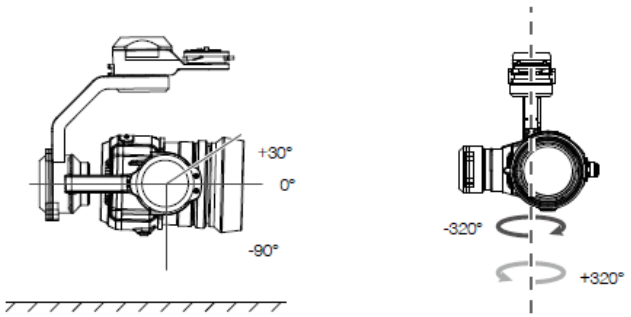


Inspire 1 RAW Manual at p. 45.

Gimbal

Gimbal Profile

The 3-axis Gimbal provides a steady platform for the attached camera, allowing you to capture stabilized images and video. The Gimbal can tilt the camera up to 120 degrees and rotate 360 degrees.



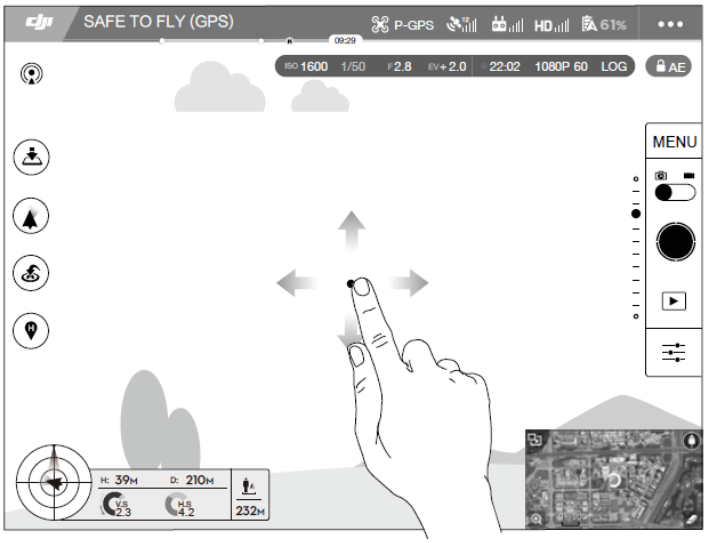
Use the gimbal dial on the remote controller to control pitch movement of the camera by default. Note that you cannot control the pan motion of the camera by default. Enable the "Master-and-Slave" mode and set the remote controller to "Slave" state if you wish to control both the pan and pitch movement of the camera.

Inspire 1 PRO Manual at p. 40.

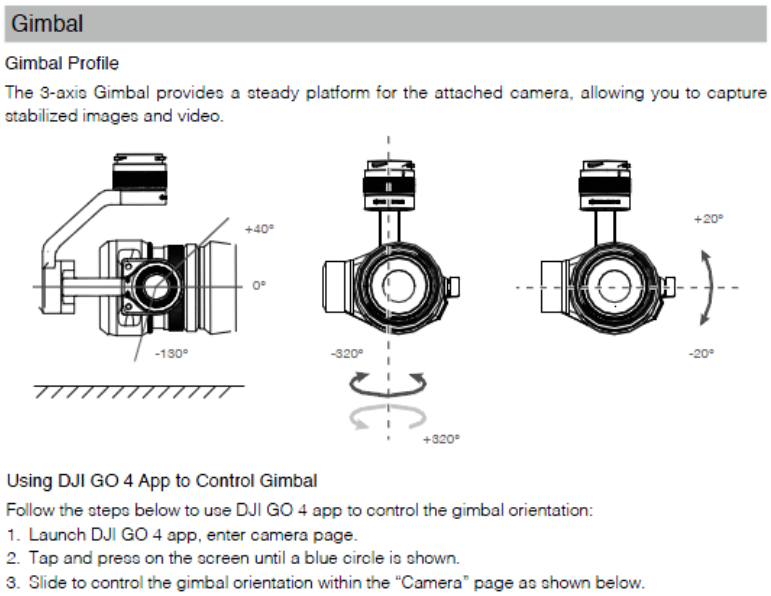
Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

1. Launch DJI GO app, enter "Camera" page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.



Id. at p. 41.



Gimbal

Gimbal Profile

The 3-axis Gimbal provides a steady platform for the attached camera, allowing you to capture stabilized images and video.

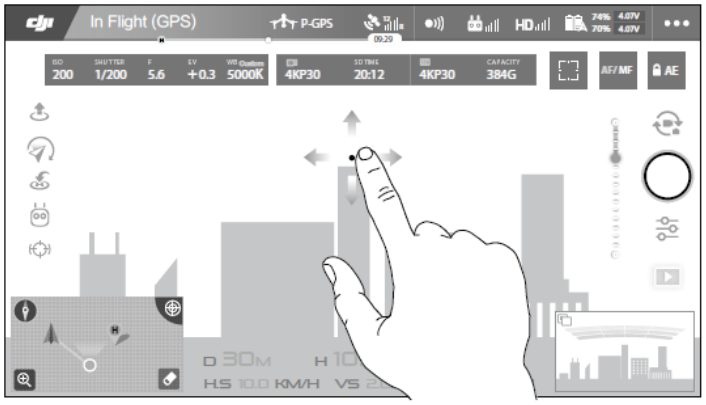
+40°
0°
-130°
-320°
+320°
+20°
-20°

Using DJI GO 4 App to Control Gimbal

Follow the steps below to use DJI GO 4 app to control the gimbal orientation:

1. Launch DJI GO 4 app, enter camera page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.

Inspire 2 Manual at p. 48.

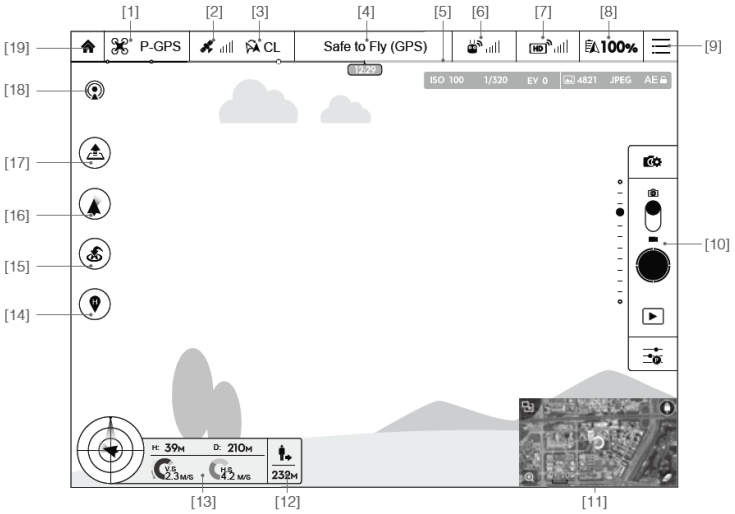


Id. at p. 49.

20. Manipulating the vehicle controls (e.g., return to home control directs the unmanned vehicle to fly back to its takeoff position) directs the unmanned vehicle to fly back to its takeoff position.

Camera

The Camera page contains a live HD video feed from the Inspire 1's camera. You can also configure various camera parameters from the Camera page.



Inspire 1 Manual at p. 41.

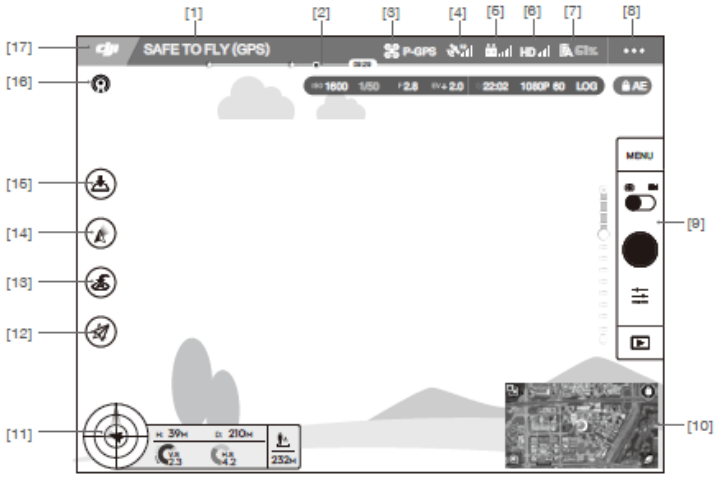
[15] Return to Home (RTH)

: Initiate RTH home procedure. Tap to have the aircraft return to the latest home point.

Id. at p. 43.

Equipment

On the Equipment page, you can enter Camera View, visit the Academy or view your flight records. Camera View.



Inspire 1 RAW Manual at p. 59.

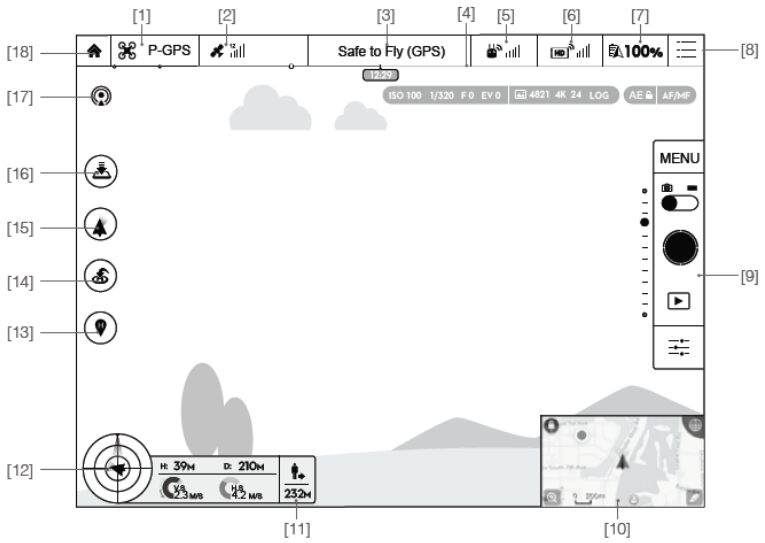
[13] Return-to-Home (RTH)

: Initiate RTH home procedure. Tap to have the aircraft return to the latest Home Point.

Id. at p. 61.

Camera

The Camera page contains a live HD video feed from the Inspire 1 Pro's camera. You can also configure various camera parameters from the Camera page.



Inspire 1 PRO Manual at p. 44.

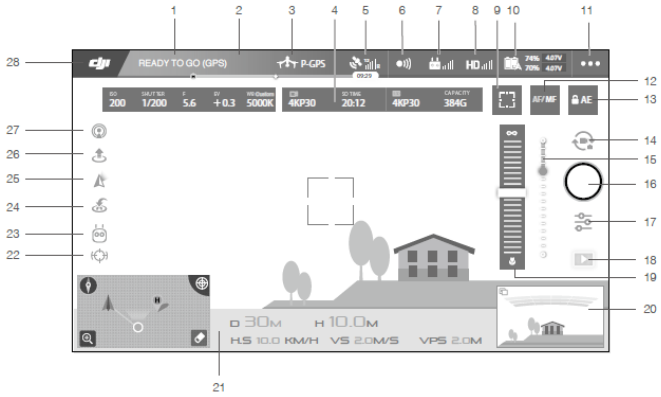
[14] Return to Home (RTH)

: Initiate RTH home procedure. Tap to have the aircraft return to the latest home point.

*Id.*at p. 49.

Camera

The Camera page contains a live HD video feed from the Inspire 2's camera. You can also configure various camera parameters from the Camera page.



Inspire 2 Manual at p. 53.

24. Smart RTH

: Initiate RTH home procedure. Tap to have the aircraft return to the last recorded home point.

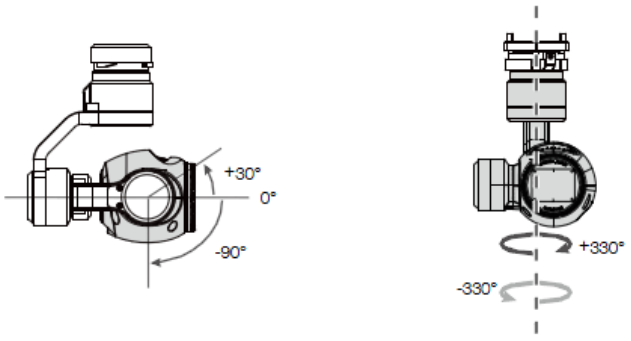
Id. at p. 56.

21. Manipulating the vehicle controls (e.g., gimbal controls) directs the unmanned vehicle.

Gimbal

Gimbal Profile

The 3-axis Gimbal provides a steady platform for the attached camera, allowing you to capture stabilized images and video. The Gimbal can tilt the camera up to 120 degrees and rotate 360 degrees.



Use the gimbal dial on the remote controller to control pitch movement of the camera by default. Note that you cannot control the pan motion of the camera by default. Enable the "Master-and-Slave" mode and set the remote controller to "Slave" state if you wish to control both the pan and pitch movement of the camera.

Inspire 1 Manual at p. 37.

Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

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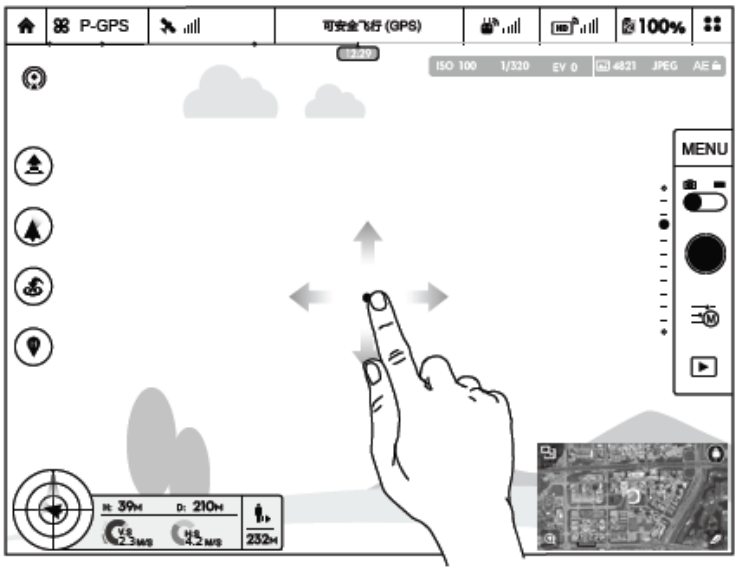
3. Slide to control the gimbal orientation within the "Camera" page as shown below.



Id. at p. 38.

Press C1 or C2 button to switch from pitch mode to yaw mode. You may use the gimbal dial to pan the gimbal under yaw mode. Press C1 or C2 again to exit yaw mode.
While pressing the C1 button, turn the gimbal dial to focus the X5 camera manually.
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Using DJI GO App to Control Gimbal

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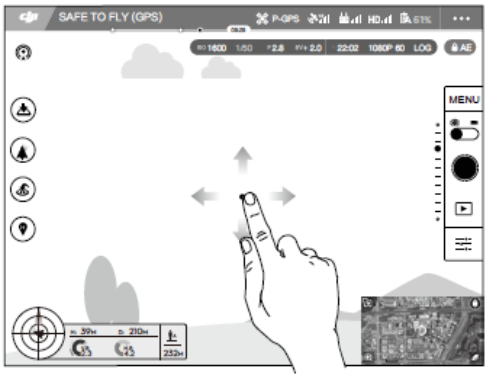
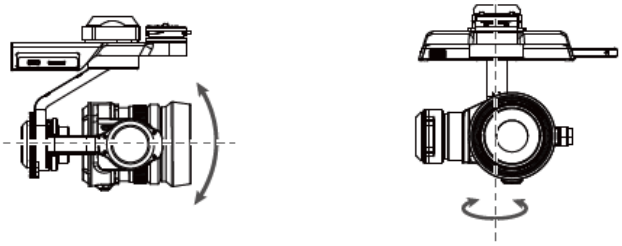


Gimbal Operation Modes

Three Gimbal operation modes are available. Switch between the different operation modes on the Camera page of the DJI GO App. Note that your mobile device must be connected to the remote controller for changes to take effect. Refer to the table below for details:



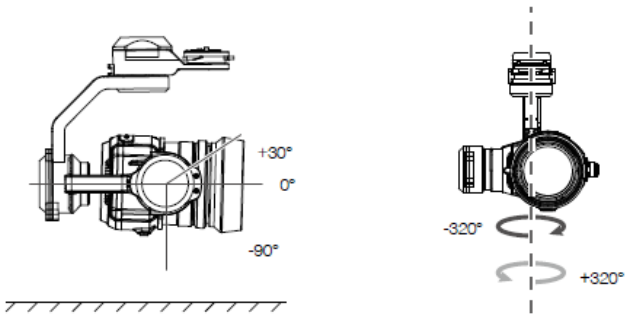
Pitch Pan

Inspire 1 RAW Manual at p. 45.

Gimbal

Gimbal Profile

The 3-axis Gimbal provides a steady platform for the attached camera, allowing you to capture stabilized images and video. The Gimbal can tilt the camera up to 120 degrees and rotate 360 degrees.



Use the gimbal dial on the remote controller to control pitch movement of the camera by default. Note that you cannot control the pan motion of the camera by default. Enable the "Master-and-Slave" mode and set the remote controller to "Slave" state if you wish to control both the pan and pitch movement of the camera.

Inspire 1 PRO Manual at p. 40.

Using DJI GO App to Control Gimbal

Follow the steps below to use DJI GO app to control the gimbal orientation:

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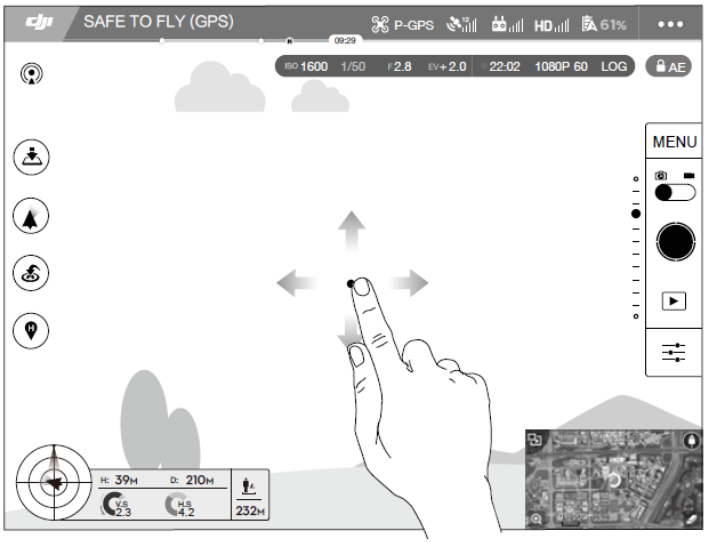
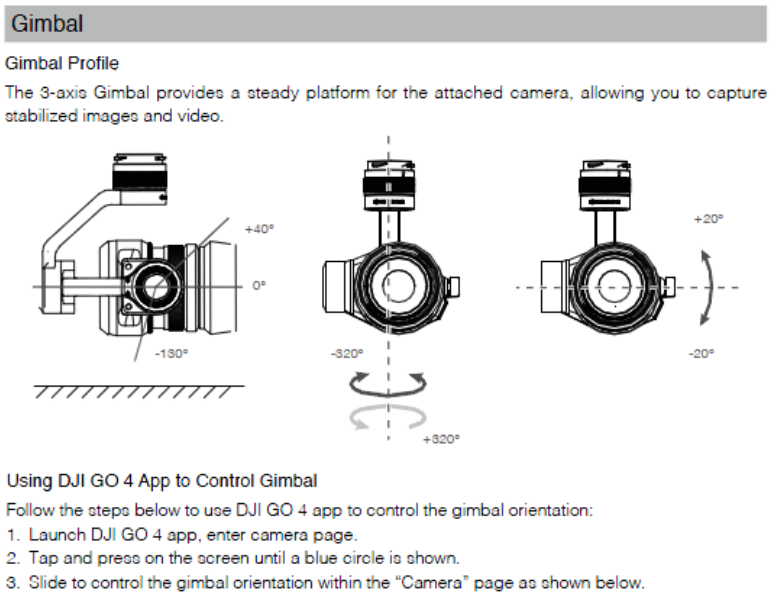
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.



Id. at p. 41.



Gimbal

Gimbal Profile

The 3-axis Gimbal provides a steady platform for the attached camera, allowing you to capture stabilized images and video.

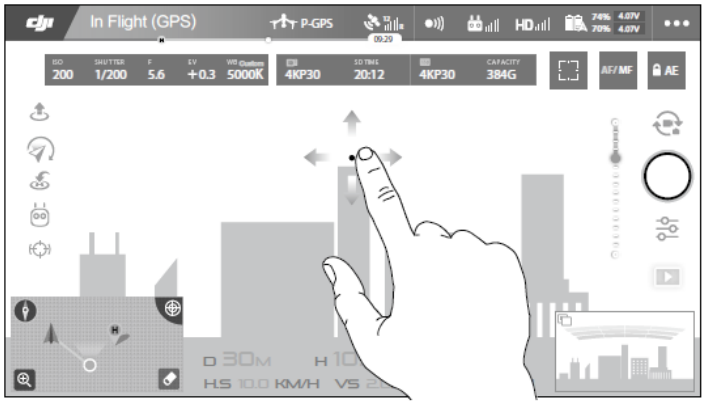
+40°
0°
-130°
-320°
+320°
+20°
-20°

Using DJI GO 4 App to Control Gimbal

Follow the steps below to use DJI GO 4 app to control the gimbal orientation:

1. Launch DJI GO 4 app, enter camera page.
2. Tap and press on the screen until a blue circle is shown.
3. Slide to control the gimbal orientation within the "Camera" page as shown below.

Inspire 2 Manual at p. 48.



Id. at p. 49.

22. The Accused Devices include a control to command the unmanned vehicle to one or more predetermined poses.

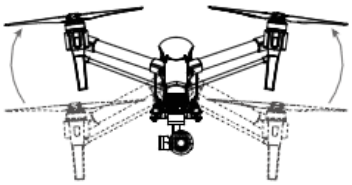
Transformation Switch / RTH Button

The Transformation Switch / RTH Button combination serves two functions. Toggle the switch up or down to raise or lower the landing gear. Or, press the button to activate the Return to Home (RTH) procedure.

Transformation Switch

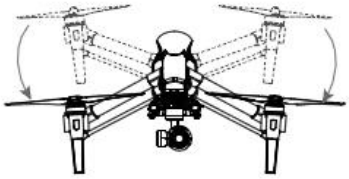
This switch has two positions. The effect of toggling the switch to any of these positions is defined below:

1. Raise: Raise the landing gear to its upper most position.



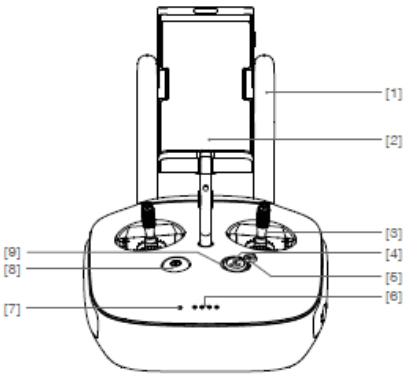
Inspire 1 Manual at p. 28.

2. Lower: The landing gear will lower to its lowest position for landing.



Id. at p. 29.

Remote Controller Diagram



[1] Antennas (P32)
Relays aircraft control and video signal.

[2] Mobile Device Holder
Mounting place for your mobile device.

[3] Control Stick
Controls aircraft orientation.

[4] Return Home (RTH) Button (P31)
Press and hold the button to initiate Return to Home (RTH).

[5] Transformation Switch (P30)
Toggle the switch up or down to raise or lower the landing gear.

Inspire 1 RAW Manual at p. 12.

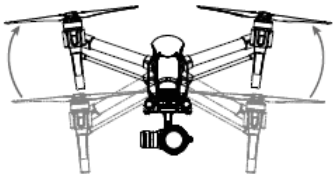
Transformation Switch / RTH Button

The Transformation Switch / RTH Button combination serves two functions. Toggle the switch up or down to raise or lower the landing gear. Or, press the button to activate the Return to Home (RTH) procedure.

Transformation Switch

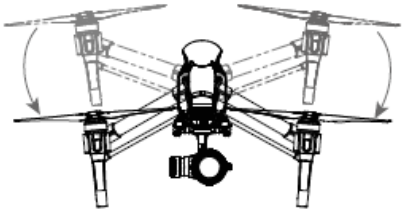
This switch has two positions. The effect of toggling the switch to any of these positions is defined below:

1. **Raise:** Raise the landing gear to its upper most position.



Inspire 1 PRO Manual at p. 29.

2. **Lower:** The landing gear will lower to its lowest position for landing.



Id. at p. 30.

Transformation Switch / RTH Button

The Transformation Switch / RTH Button combination serves two functions. Toggle the switch up or down to raise or lower the landing gear. Or, press the button to activate the Return to Home (RTH) procedure. Intelligent landing gear will automatically raise after takeoff and lower when landing. They can also be controlled manually using the Transformation Switch.

Transformation Switch

This switch has two positions. The effect of toggling the switch to any of these positions is defined below:

Inspire 2 Manual at p. 39.

23. Defendant has been on notice of the '230 patens since, at the latest, its receipt of RIS' licensing agent's e-mail dated February 8, 2019.

24. Upon information and belief, Defendant has not altered its infringing conduct after receiving the February 8, 2019 e-mail.

25. Upon information and belief, Defendant's continued infringement despite its knowledge of the '230 patent and the accusation of infringement has been objectively reckless and willful.

26. In particular, Defendant's customers' and end-users' use of Defendant's products that include methods for controlling an unmanned vehicle, including, but not limited to, the Accused Devices, that is facilitated by the use of the technology patented under the '230 patent. Thus, Defendant's customers and end-users are able to use and benefit from products that utilize a method for controlling an unmanned vehicle.

27. On information and belief, in order to generate profits and revenues, Defendant markets and promotes, e.g., through its website, advertising and sales personnel, the use of its products that infringe the '230 patent when used as intended by Defendant's customers and end-users. Defendant's customers and end-users use such products (including, e.g., the Accused Devices). Defendant further instructs its customers and end-users how to use such products in a manner that infringe the '230 patent (e.g., through on-line technical documentation, instructions, and technical support). Defendant further instructs its customers and end-users to infringe the '230 patent through the products themselves, e.g., through instructions.

28. In particular, Defendant instructs its customers and end-users through at least on-line support instructions and documentation over the Internet how to use the Accused Products.

29. Defendant still further makes such products accessible to its customers and

end-users via the Internet, thus enabling and encouraging its customers and end-users to use such products to infringe the '230 patent.

30. On information and belief, even though Defendant has been aware of the '230 patent since no later than its receipt of the February 8, 2019 e-mail and Defendant has neither made any changes to the functionality or operations of its methods for controlling an unmanned vehicle, to avoid infringing the '230 patent. To date, Defendant has not identified a single action that it has taken to avoid infringement (e.g., by designing around) since it became aware of the '230 patent.

31. On information and belief, Defendant itself is unaware of any legal or factual basis that its actions do not constitute direct or indirect infringement of the '230 patent. To date, Defendant has not produced any opinion of counsel, request for opinion of counsel, evaluation, analysis, or investigation relating to the validity, scope, interpretation, construction, enforceability, unenforceability, or the infringement or potential infringement of any claim of the '230 patent.

32. As such, on information and belief, despite the information Defendant obtained from February 8, 2019 e-mail, Defendant continues to specifically intend for and encourage its customers and end-users to use its products in a manner that infringe the claims of the '230 patent. In addition, since at least its receipt of RIS' licensing agent's February 8, 2010 e-mail, Defendant has deliberately avoided taking any actions (e.g., designing around or providing notice to its customers) to avoid confirming that its actions continue to specifically encourage its customers and end-users to use its products in a manner that infringe the claims of the '230 patent.

33. Defendant's actions of, *inter alia*, making, importing, using, offering for sale,

and/or selling such systems and methods constitute an objectively high likelihood of infringement of the '230 patent, which was duly issued by the United States Patent and Trademark Office and are presumed valid. Since at least its receipt of RIS' licensing agent's e-mail dated February 8, 2019, Defendant was aware that there is an objectively high likelihood that its actions constituted infringement of the '230 patent and that the '230 patent is valid. Despite Defendant's knowledge of that risk, on information and belief, Defendant has not made any changes to the relevant operation of its accused methods. Instead, Defendant continued to, among other things, make, use, offer for sale, and/or sell products and/or services patented under the '230 patent. As such, Defendant willfully, wantonly and deliberately infringed the '230 patent in disregard of RIS' rights under the '230 patent.

34. RIS is entitled to recover from Defendant the damages sustained by RIS as a result of Defendant's infringement of the '230 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

RIS hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, RIS requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '230 patent;

B. A judgment that Defendant has induced infringement of the '230 patent;

C. An award of damages to be paid by Defendant adequate to compensate RIS for Defendant's past infringement of the '230 patent and any continuing or future infringement

through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

D. An award of enhanced damages pursuant to 35 U.S.C. § 284 for Defendant's willful infringement of the '230 patent subsequent to the date of its notice of the '230 patent;

E. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of RIS' reasonable attorneys' fees; and

F. An award to RIS of such further relief at law or in equity as the Court deems just and proper.

Dated: April 4, 2019

/s/ Brandon C. Fernald

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