IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

TEXTRON INNOVATIONS INC., *Plaintiff,*	§	CIVIL ACTION 2:22-cv-0351-RWS-RSP
	§	
v.	§	
	§	
SZ DJI TECHNOLOGY CO., LTD., DJI EUROPE B.V., SZ DJI BAIWANG TECHNOLOGY CO. LTD., and IFLIGHT TECHNOLOGY COMPANY LTD., *Defendants.*	§	

PARTIES' JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT
PURSUANT TO PATENT RULE 4-3

Pursuant to the P.R. 4-3 and this Court's Docket Control Order (Dkt. 38), Plaintiff Textron Innovations Inc. ("Textron Innovations") and Defendants SZ DJI Technology Co., Ltd., DJI Europe B.V., SZ DJI Baiwang Technology Co., Ltd. and iFlight Technology Company Ltd. (collectively, "DJI") submit this Joint Claim Construction and Prehearing Statement.

In this case, Textron Innovations asserts the following patents and claims:

U.S Patent No.	Asserted Claims
10,275,950	1-5, 8-9, 12-14, 16
8,332,082	1-20
8,682,505	1-20
11,288,972	1-20

DJI Europe B.V. v. Textron Innovations Inc., IPR2023-01105
Textron Exhibit 2010, Page 1 of 36

I. P.R. 4-3(a)(1): AGREED CLAIM CONSTRUCTIONS

The parties currently do not agree on any constructions. However, the parties intend to continue to work towards any agreements that may be reached and will file an amended JCCS indicating any agreements.

II. P.R. 4-3(a)(2): DISPUTED CLAIM CONSTRUCTIONS

Exhibit A includes a table that provides each parties' proposed constructions for all terms. Exhibit B includes a table with Textron Innovations' identification of intrinsic and extrinsic evidence. Exhibit C includes a table with DJI's identification of intrinsic and extrinsic evidence. Each party reserves the right to rely on any intrinsic or extrinsic evidence identified by the other party

III. P.R. 4-3(a)(3): ANTICIPATED LENGTH OF TIME FOR HEARING

The parties anticipate the length of time necessary for the claim construction hearing will be about three hours, divided equally between the parties.

IV. P.R. 4-3(a)(4): ANTICIPATED WITNESSES AT THE HEARING

The parties do not intend to call any live witnesses, including expert witnesses, at the claim construction hearing.

V. P.R. 4-3(a)(5): OTHER ISSUES TO BE ADDRESSED

Textron Innovations objects to DJI's identification of the following terms as indefinite in Exhibit C to this Joint Claim Construction and Prehearing Statement:

- Term 6: "selectively activat[es/ing]" (Claims 1 and 11 of '082 Patent);
- Term 8: "A method to control flat yawing turns of an aircraft while maintaining a constant vector heading across a ground surface, the method comprising" (Claim 11 of '082 Patent); and
- Term 12: "continuously moves in a yaw direction while maintaining the constant vector heading" (Claims 1 and 11 of the '505 Patent).

Textron Innovations' position is that DJI did not identify any of the above terms as indefinite in its Invalidity Contentions as required under P.R. 3-3(d). Textron Innovations intends to move to strike these indefiniteness arguments as untimely. DJI's lengthy argument below is more appropriate for briefing on Textron Innovations' impending motion, not this JCCS submission. But, in any event, DJI's position concedes that its contentions do not identify an indefiniteness position for these terms and attempts to excuse its failure to timely disclose its indefiniteness positions by casting blame on Textron Innovations. And the vast majority of DJI's arguments have been rejected in this Court. Textron Innovations looks forward to fully responding to DJI's positions in briefing.

DJI notes Textron Innovations raised this issue for the first time earlier today hours before filing this document. Textron Innovations has been on notice of DJI's position for at least a month when, on September 29, 2023, DJI served its P.R. 4-2 disclosures and indicated that it was pursuing indefiniteness and engaging an expert to opine on these issues. Textron Innovations did not raise this issue at any point, including during the parties' first meet-and-confer on claim construction issues on October 26, 2023. Textron Innovations identifies no prejudice because there is none. Moreover in its June 19, 2023 Corrected Invalidity Contentions, DJI explicitly noted that it "reserves the right to assert that a claim is indefinite, not enabled, or fails to meet the written description requirement based on any claim construction position taken by Textron Innovations in this case or based on any claim construction the Court may adopt." Id. ¶ 7 at p. 5 (emphasis added). Textron Innovations notably proposed no construction for any of the terms at issue in its P.R. 4-2 disclosures that would provide them with any definite meaning. As for "constant vector heading," which is at the center of DJI's indefiniteness arguments regarding the last two terms, DJI expressly stated in its Invalidity Contentions that independent Claims 1 and 11 of both the 505 and 082

Patents, and all of their dependent Claims, are invalid as indefinite "due to the … 'constant vector heading' limitation[], which appear[s] nowhere in the specification, lack antecedent basis, [is] undefined, and [is] invalid as indefinite since it does not inform a POSITA, with reasonable certainty, of the scope of the claimed inventions." Id. at 83, 90. DJI explained this to Textron Innovations' counsel at the parties' October 26 meet-and-confer, specifically that, under the plain and ordinary meaning of "heading," which Textron Innovations is pursuing, a constant vector "heading" cannot be maintained while the aircraft rotates or turns in a yaw direction. Textron Innovations had no response. As for "selectively activat[es/ing]," in DJI's contentions, DJI stated in its Invalidity Contentions that, "based upon Textron Innovations' apparent understanding of this claim," there was no written description support or any enabling disclosure for this term. Id. at 84, 89.

The parties are not aware of any other issues at this time that might be appropriately addressed at a prehearing conference prior to the claim construction hearing.

Dated: October 27, 2023

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on October 27, 2023, with a copy of this document via email.

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EXHIBIT A

EXHIBIT A

a. ’082 AND ’505 PATENTS

Term No.	Term	Textron Innovations Construction	DJI Construction
1.	“initialization command logic” [’082 Patent: Claims 1, 11]	Plain and ordinary meaning.	Indefinite. Alternatively, “logic that enables portions of the control architecture.”
2.	“model” [’082 Patent: Claims 1, 11]	Plain and ordinary meaning.	“a set of equations that represent the aerodynamics of the aircraft”
3.	“lateral control architecture” [’082 Patent: Claims 1, 5, 11, 15, 16, 17; ’505 Patent: Claims 1, 5]	Plain and ordinary meaning.	“architecture, separate from the longitudinal control architecture, that controls the lateral movement of the aircraft”
4.	“longitudinal control architecture” [’082 Patent: Claims 1, 8, 9, 11, 18, 19, 20; ’505 Patent: Claims 1, 8, 9]	Plain and ordinary meaning.	“architecture, separate from the lateral control architecture, that controls the longitudinal movement of the aircraft”
5.	“decoupl[e/ing]” [’082 Patent: Claims 1, 11]	Plain and ordinary meaning.	Indefinite. Alternatively, “separat[e/ing].”
6.	“selectively activat[es/ing]” [’082 Patent: Claims 1, 11]	Plain and ordinary meaning.	Indefinite. Alternatively, “automatically activates without a manual switch.”

Term No.	Term	Textron Innovations Construction	DJI Construction
7.	"constant vector flat turn motion" "constant vector flat turn" ['082 Patent: Claims 4, 14; '505 Patent: Claims 4, 11]	Plain and ordinary meaning.	"movement along a flight path with a fixed speed and fixed direction while rotating along the yaw axis without pitching or rolling"
8.	"A method to control flat yawing turns of an aircraft while maintaining a constant vector heading across a ground surface, the method comprising:" ['082 Patent: Claim 11]	Plain and ordinary meaning.	Preamble is limiting. Indefinite.
9.	"flat yawing turns" [082 Patent: Claims 11, 12, 13]	Plain and ordinary meaning.	"rotations around the yaw axis without pitching or rolling"
10.	Preambles ("The aircraft of claim…") ['082 Patent: Claims 17, 19, 20; '505 Patent: Claims 17, 19, 20]	"The method of claim…"	Plain and ordinary meaning.
11.	"continuously moves in a yaw direction" ['505 Patent: Claims 1, 11]	Plain and ordinary meaning.	"rotates around the yaw axis without stopping until it reaches a predetermined yaw angle"
12.	"continuously moves in a yaw direction while maintaining the constant vector heading" ['505 Patent: Claims 1, 11]	Plain and ordinary meaning.	Indefinite.

Term No.	Term	Textron Innovations Construction	DJI Construction
13.	"flat yaw movement of the aircraft" ['505 Patent: Claim 11]	Plain and ordinary meaning.	"rotation around the yaw axis without pitching or rolling"
14.	"lateral control hatch" ['505 Patent: Claims 7, 17]	"lateral control latch"	Plain and ordinary meaning.
15.	"longitudinal control hatch" ['505 Patent: Claims 10, 20]	"longitudinal control latch"	Plain and ordinary meaning.

b. '950 PATENT

Term No.	Term	Textron Innovations Construction	DJI Construction
16.	"An aircraft, comprising" ['950 Patent: Claim 1]	Plain and ordinary meaning, which can include remote components.	Preamble is limiting. "A vehicle (such as an airplane or balloon) for traveling through the air, comprising"
17.	"[the/a] transceiver having a transceiver identity associated with pilot identification information" ['950 Patent: Claims 1, 9, 13]	Plain and ordinary meaning.	"The transceiver has a transceiver identity, which is associated with the pilot identification information"

c. '972 PATENT

Term No.	Term	Textron Innovations Construction	DJI Construction
18.	"An autonomous vehicle fleet control method, comprising" ['972 Patent: Claim 1]	Plain and ordinary meaning.	Preamble is limiting. The method elements are performed in the listed order; Fleet is more than one vehicle; Undertaken or carried on without outside control
19.	"obtaining, by a fleet controller, from a master schedule, a mission for a vehicle of a fleet of autonomous vehicles, wherein the mission is associated with a mission entry of the master schedule"/ "obtain[ing], from a master schedule, a mission for a vehicle of a fleet of autonomous vehicles, wherein [the/a] mission is associated with a mission entry of the master schedule" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	Obtain[ing] is performed by the fleet controller
20.	"identify[ing] a flight path associated with the mission" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	Identify[ing] is performed by the fleet controller
21.	"verify[ing] a usability of the flight path with a unmanned aircraft system (UAS) traffic management (UTM), wherein the UTM	Plain and ordinary meaning.	"verify[ing] a usability of the flight path with a system for managing vehicle congestion for unmanned aircraft (UTM), wherein the UTM performs checking on the flight path for (i) vehicles in the flight path, (ii) availability of the

Term No.	Term	Textron Innovations Construction	DJI Construction
	performs checking on the flight path for traffic in the flight path, availability of the flight path due to flight restrictions and requirements for use of the flight path" ['972 Patent: Claims 1, 8, 15]		flight path due to restrictions on a vehicle operating in a certain area and (iii) requirements that the vehicle or its operation must meet to use the flight path" Verify[ing] is performed by the fleet controller;
22.	"modify[ing] the flight path according to data from the UTM in response to the UTM indicating that the usability of the flight path is not verified" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	Modify[ing] is performed by the fleet controller
23.	"generat[e/ing] vehicle commands according to mission parameters associated with the mission based on the flight path" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	Generat[e/ing] is performed by the fleet controller
24.	"maintain[ing] a persistent connection with the vehicle" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	The fleet controller "maintains a persistent connection between the fleet controller and the vehicle"
25.	"sending the vehicle commands to the vehicle using the connection, the vehicle commands causing the vehicle to	Plain and ordinary meaning.	Sending of vehicle commands is performed by the fleet controller The commands are sent over the persistent connection from the controller to the vehicle

Term No.	Term	Textron Innovations Construction	DJI Construction
	execute the mission under control of the fleet controller"/ "send the vehicle commands to the vehicle using the connection, wherein the vehicle is configured to receive the vehicle command and execute the mission according to the vehicle commands" ['972 Patent: Claims 1, 8, 15]		
26.	"monitor[ing] operation of the vehicle during performance of the mission" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	Monitor[ing] is performed by the fleet controller
27.	"fleet controller" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	"A controller external to a group of vehicles that controls the vehicles" Controller is of multiple vehicles
28.	"A fleet controller for controlling an autonomous vehicle fleet, comprising" ['972 Patent: Claim 8]	Plain and ordinary meaning.	Preamble is limiting; Fleet is more than one vehicle; The recited elements must be part of the fleet controller not external to it; Undertaken or carried on without outside control; A controller external to a vehicle that controls the vehicle
29.	"An autonomous vehicle fleet control system,	Plain and ordinary meaning.	Preamble is limiting; Fleet is more than one vehicle; Undertaken or carried on without outside control;

Term No.	Term	Textron Innovations Construction	DJI Construction
	comprising" ['972 Patent: Claim 15]		The system comprises the distinct recited elements; Specific order of performance

EXHIBIT B

EXHIBIT B

a. ’082 AND ’505 PATENTS

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
1.	“initialization command logic” [’082 Patent: Claims 1, 11]	Plain and ordinary meaning.	’082 Patent, Claims 1 and 11, 5:2-8, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure. Crocker, DICTIONARY OF AVIATION (2d Edition 2007) (TII_0005583-86) *DJI Europe B.V. v. Textron Innovations Inc.*, IPR2023-01105, Paper No. 2, Ex. 1003 (P.T.A.B. July 28, 2023) Expert Declaration of Dr. Bill Michalson
2.	“model” [’082 Patent: Claims 1, 11]	Plain and ordinary meaning.	’082 Patent, Claims 1 and 11, 4:51-63. Crocker, DICTIONARY OF AVIATION (2d Edition 2007) (TII_0005583-86)
3.	“lateral control architecture” [’082 Patent: Claims 1, 11; ’505 Patent: Claims 1, 5]	Plain and ordinary meaning.	’082 Patent, Claims 1, 5, and 11, 4:33-42; 5:41-50, Fig. 7 and accompanying disclosure; ’505 Patent, Claims 1and 5, 4:43-52; 5:53-62, Fig. 7 and accompanying disclosure.
4.	“longitudinal control architecture” [’082 Patent: Claims 1, 8, 9, 11, 18, 19, 20; ’505 Patent: Claims 1, 8, 9]	Plain and ordinary meaning.	’082 Patent, Claims 1, 8, and 11, 4:33-42; 4:64-5:32, Fig. 6 and accompanying disclosure; ’505 Patent, Claims 1 and 8, 4:43-52; 5:7-44, Fig. 6 and accompanying disclosure.

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
5.	"decoupl[e/ing]" ['082 Patent: Claims 1, 11]	Plain and ordinary meaning.	'082 Patent, Claims 1 and 11, 4:51-63, 6:47-7:10, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure, Fig. 9 and accompanying disclosure, Fig. 10 and accompanying disclosure. *DJI Europe B.V. v. Textron Innovations Inc.*, IPR2023-01105, Paper No. 2 (P.T.A.B. July 28, 2023) *DJI Europe B.V. v. Textron Innovations Inc.*, IPR2023-01105, Paper No. 2, Ex. 1003 (P.T.A.B. July 28, 2023) Expert Declaration of Dr. Bill Michalson
6.	"selectively activat[es/ing]" ['082 Patent: Claims 1, 11]	Plain and ordinary meaning.	'082 Patent, Claims 1 and 11, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure, Fig. 10 and accompanying disclosure, 5:2-8, 6:47-7:10, 7:32-37, 7:42-47. Expert Declaration of Dr. Bill Michalson
7.	"constant vector flat turn motion" "constant vector flat turn" ['082 Patent: Claims 4, 14; '505 Patent: Claims 4, 11]	Plain and ordinary meaning.	'082 Patent, 1:13-55, 2:48-51, 3:2-5, 3:37-51, 4:43-53, 5:41-44, 6:47-7:10, Fig. 2 and accompanying disclosure, Fig. 3 and accompanying disclosure, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure; '505 Patent, 1:13-55, 2:58-61, 3:12-15, 3:47-61, 4:53-63; 5:53-57, 6:63-7:26, Fig. 2 and accompanying disclosure, Fig. 3 and accompanying disclosure, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure. WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY OF THE ENGLISH LANGUAGE UNABRIDGED (1981) (TII_0005590-92)
8.	"A method to control flat yawing turns of an aircraft while maintaining a constant vector	Plain and ordinary meaning.	'082 Patent, Claim 11, 1:35-36, 1:41-50, 3:12-14, 3:25-36, 3:52-4:21, 6:50-55, 7:32-53, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure.

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
	heading across a ground surface, the method comprising:" ['082 Patent: Claim 11]		*DJI Europe B.V. v. Textron Innovations Inc.*, IPR2023-01105, Paper No. 2, Ex. 1003 (P.T.A.B. July 28, 2023) Expert Declaration of Dr. Bill Michalson
9.	"flat yawing turns" [082 Patent: Claims 11, 12, 13]	Plain and ordinary meaning.	'082 Patent, 1:13-55, 2:48-51, 3:2-5, 3:37-51, 4:43-53, 5:41-44, 6:47-7:10, Fig. 2 and accompanying disclosure, Fig. 3 and accompanying disclosure, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure. WEBSTER'S THIRD NEW INTERNATIONAL DICTIONARY OF THE ENGLISH LANGUAGE UNABRIDGED (1981) (TII_0005590-92)
10.	Preambles ("The aircraft of claim…") ['082 Patent: Claims 17, 19, 20; '505 Patent: Claims 17, 19, 20]	"The method of claim…"	'082 Patent, Claims 11-16, 18, abstract, 4:22-32; '505 Patent, Claims 11-16, 18, abstract, 4:32-42.
11.	"continuously moves in a yaw direction" ['505 Patent: Claims 1, 11]	Plain and ordinary meaning.	'505 Patent, 1:35-36, 1:41-50, 3:9-13, 3:20-33, 3:33-46, 3:61-4:31, 7:47-67, Fig. 2 and accompanying disclosure, Fig. 3 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure.
12.	"continuously moves in a yaw direction while maintaining the constant vector heading" ['505 Patent: Claims 1, 11]	Plain and ordinary meaning.	'505 Patent, 1:35-36, 1:41-50, 3:9-13, 3:20-33, 3:33-46, 3:61-4:31, 6:66-7:4, 7:47-67, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure. *DJI Europe B.V. v. Textron Innovations, Inc.*, IPR2023-001104, Paper No. 2, Ex. 1003 (P.T.A.B. July 28, 2023)

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
			’505 Patent Prosecution History, October 16, 2013 Remarks in Response to Office Action dated July 17, 2013, at 6 (TII_0003584) Expert Declaration of Dr. Bill Michalson
13.	“flat yaw movement of the aircraft” [’505 Patent: Claim 11]	Plain and ordinary meaning.	’505 Patent, 1:13-55, 2:58-61, 3:12-15, 3:47-61, 4:53-63, 5:53-57, 6:63-7:26, Fig. 2 and accompanying disclosure, Fig. 3 and accompanying disclosure, Fig. 6 and accompanying disclosure, Fig. 7 and accompanying disclosure. WEBSTER’S THIRD NEW INTERNATIONAL DICTIONARY OF THE ENGLISH LANGUAGE UNABRIDGED (1981) (TII_0005590-92)
14.	“lateral control hatch” [’505 Patent: Claims 7, 17]	“lateral control latch”	’505 Patent, 7:27-46, Fig. 9 and accompanying disclosure, Claim 4, Claim 7, Claim 10, Claim 14.
15.	“longitudinal control hatch” [’505 Patent: Claims 10, 20]	“longitudinal control latch”	’505 Patent, 7:27-46, Fig. 9 and accompanying disclosure, Claim 4, Claim 7, Claim 10, Claim 14.

b. ’950 PATENT

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
16.	“An aircraft, comprising” [’950 Patent: Claim 1]	Plain and ordinary meaning, which can include remote components.	’950 Patent, 3:16-22, 4:23-28, Fig. 3 and accompanying disclosure, Claims 1-3, 12.

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
17.	"[the/a] transceiver having a transceiver identity associated with pilot identification information" ['950 Patent: Claims 1, 9, 13]	Plain and ordinary meaning.	'950 Patent, 3:20-28, 4:54-59, Claims 1, 9, 13. Stevenson, et al., NEW OXFORD AMERICAN DICTIONARY (3d Edition 2010) (TII_0005587-89)

c. ’972 PATENT

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
18.	“An autonomous vehicle fleet control method, comprising” [’972 Patent: Claim 1]	Plain and ordinary meaning.	’972 Patent, Abstract, 1:5-19, 2:3-8, 2:21-32, 2:37-52, 3:15-26, 3:40-55, 4:44-48, 8:26-31, 8:50-57, 9:15-21, 10:4-11:33, 11:56-12:16, 12:39-13:2, 13:24-50, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claim 1.
19.	“obtaining, by a fleet controller, from a master schedule, a mission for a vehicle of a fleet of autonomous vehicles, wherein the mission is associated with a mission entry of the master schedule”/ “obtain[ing], from a master schedule, a mission for a vehicle of a fleet of autonomous vehicles, wherein [the/a] mission is associated with a mission entry of the master schedule” [’972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning. No order of steps required.	’972 Patent, 2:9-11, 3:21-26, 3:31-39, 4:66-5:1, 5:17-23, 5:52-63, 6:8-12, 6:19-24, 8:44-45, 8:50-64, 9:42-10:8, 11:45-13:59, Fig. 3A and accompanying disclosure, Fig. 3B and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claims 1,2, 8, 9, 15, 16. Stevenson, et al., NEW OXFORD AMERICAN DICTIONARY (3d Edition 2010) (TII_0005587-89)
20.	“identify[ing] a flight path associated with the mission” [’972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	’972 Patent, 4:52-57, 6:19-24, 8:57-67, 9:42-64, 10:15-23, 11:45-13:59, Fig. 2 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claims 1, 8, 15. Stevenson, et al., NEW OXFORD AMERICAN DICTIONARY (3d Edition 2010) (TII_0005587-89)
21.	“verify[ing] a usability of the flight path with a unmanned aircraft system (UAS) traffic	Plain and ordinary meaning.	’972 Patent, 3:56-63, 4:23-30, 4:33-41, 8:64-9:14, 9:42-64, 10:9-23, 10:45-50, 11:6-31, 11:45-13:59, Fig. 5 and accompanying disclosure, Claims 1, 7, 8, 14, 15, 20.

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
	management (UTM), wherein the UTM performs checking on the flight path for traffic in the flight path, availability of the flight path due to flight restrictions and requirements for use of the flight path" ['972 Patent: Claims 1, 8, 15]		
22.	"modify[ing] the flight path according to data from the UTM in response to the UTM indicating that the usability of the flight path is not verified" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	'972 Patent, 4:23-41, 8:67-9:14, 9:42-64, 10:9-23, 10:45-50, 11:6-31, 11:45-13:59, Fig. 5 and accompanying disclosure, Claims 1, 8, 15.
23.	"generat[e/ing] vehicle commands according to mission parameters associated with the mission based on the flight path" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	'972 Patent, 4:23-43, 4:48-57, 9:42-64, 10:24-31, 11:19-44, 11:45-13:59, Fig. 5 and accompanying disclosure, Claims 1, 8, 15. Stevenson, et al., NEW OXFORD AMERICAN DICTIONARY (3d Edition 2010) (TII_0005587-89)
24.	"maintain[ing] a persistent connection with the vehicle" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	'972 Patent, 2:33-40, 2:44-48, 3:23-30, 4:30-37, 4:46-47, 6:25-39, 7:31-8:25, 9:42-64, 10:45-54, 10:55-11:5, 11:45-13:59, Fig. 1 and accompanying disclosure, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claims 1, 3, 4, 8, 10, 15, 17.
25.	"sending the vehicle commands to the vehicle using the connection, the vehicle commands causing the vehicle to execute the mission under control of the fleet controller"/	Plain and ordinary meaning.	'972 Patent, 2:33-40, 2:44-48, 3:23-30, 4:30-37, 4:46-57, 6:25-39, 7:27-8:25, 9:22-64, 10:32-54, 10:55-11:5, 11:32-44, 11:45-13:59, Fig. 1 and accompanying disclosure, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claims 1, 4, 5, 6, 8, 10, 11, 13, 15, 17, 18.

Term No.	Term	Textron Innovations Construction	Textron Innovations Support
	"send the vehicle commands to the vehicle using the connection, wherein the vehicle is configured to receive the vehicle command and execute the mission according to the vehicle commands" ['972 Patent: Claims 1, 8, 15]		
26.	"monitor[ing] operation of the vehicle during performance of the mission" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	'972 Patent, 2:3-8, 3:16-33, 4:4-8, 4:25-41, 6:41-59, 8:26-41, 9:42-64, 10:9-23, 10:45-54, 11:6-31, 11:45-13:59, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claims 1, 3, 4, 5, 8, 10, 11, 15.
27.	"fleet controller" ['972 Patent: Claims 1, 8, 15]	Plain and ordinary meaning.	'972 Patent, 1:5-7, 2:3-8, 2:26-32, 3:23-26, 4:23-65, 5:62-67, 9:42-64, 11:45-13:59, Fig. 1 and accompanying disclosure, Fig. 2 and accompanying disclosure, Fig. 3 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claims 1, 8, 15.
28.	"A fleet controller for controlling an autonomous vehicle fleet, comprising" ['972 Patent: Claim 8]	Plain and ordinary meaning. No order required.	'972 Patent, Abstract, 1:5-10, 2:3-8, 2:21-32, 2:37-52, 3:15-17, 3:23-26, 3:40-55, 4:44-48, 8:26-31, 8:50-57, 9:15-21, 9:42-64, 10:4-11:33, 11:56-12:16, 12:39-13:2, 13:10-50, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claim 8.
29.	"An autonomous vehicle fleet control system, comprising" ['972 Patent: Claim 15]	Plain and ordinary meaning. No order required.	'972 Patent, 1:5-10, 1:48-50, 2:3-8, 2:26-32, 2:37-52, 3:18-26, 3:40-55, 4:44-48, 6:25-39, 8:26-31, 8:50-57, 9:15-21, 9:42-64, 10:4-11:33, 11:56-12:16, 12:39-13:2, 13:10-50, Fig. 2 and accompanying disclosure, Fig. 4 and accompanying disclosure, Fig. 5 and accompanying disclosure, Claim 15.

EXHIBIT C

EXHIBIT C

DJI'S INTRINSIC AND EXTRINSIC EVIDENCE SUPPORTING ITS PROPOSED CONSTRUCTIONS PURSUANT TO LOCAL PATENT RULE 4-3

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
1.	"initialization command logic"	'082 patent: claims 1, 11	Indefinite. Alternatively, "logic that enables portions of the control architecture."	**'082 patent**: Cited Claims; Abstract; Figs. 6-8, 10; 2:11-16, 2:35-55, 4:43-7:10, 5:2-8, 7:33-53 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
2.	"model"	'082 patent: claims 1, 11	"a set of equations that represent the aerodynamics of the aircraft"	**'082 patent**: Cited Claims; 4:43-63 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung Tyler, *The Characteristics of Model-Following Systems as Synthesized by Optimal Control* (IEEE Oct. 1964)
3.	"lateral control architecture"	'082 patent: claims 1, 5, 11, 15, 16, 17 '505 patent, claims 1, 5	"architecture, separate from the longitudinal control architecture, that controls the lateral movement of the aircraft"	**'505 patent:** Cited Claims; Abstract; Figs. 4-10; 1:33-52, 2:7-20, 3:62-7:67 **'082 patent**: Cited Claims; Abstract; Figs. 4-10; 1:33-52, 2:7-20, 3:52-7:53 Written Opinion of the International Searching Authority, Box. No. V and Supplemental Box V Shue, US 2008/0097658, at Fig. 5; [0014], [0039]-[0042] Shue, PCT 07/01872, at Fig. 5, 10:27-12:11, 26:23-29 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung McRuer, Aircraft Dynamics and Automatic Control (1973)
4.	"longitudinal control	'082 patent: claims 1, 8,	"architecture, separate from the lateral control architecture, that	**'505 patent:** Cited Claims; Abstract; Figs. 4-10; 1:33-52, 2:7-20, 3:62-7:67

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
	architecture"	9, 11, 18, 19, 20 '505 patent: claims 1, 8, 9	controls the longitudinal movement of the aircraft"	**'082 patent**: Cited Claims, Abstract; Figs. 4-10; 1:33-52, 2:7-20, 3:52-7:53 Written Opinion of the International Searching Authority, Box. No. V and Supplemental Box V Shue, US 2008/0097658, at Fig. 5; [0014], [0039]-[0042] Shue, PCT 07/01872, at Fig. 5, 10:27-12:11, 26:23-29 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung McRuer, Aircraft Dynamics and Automatic Control (1973)
5.	"decoupl[e/ing]"	'082 patent: claims 1, 11	Indefinite. Alternatively, "separat[e/ing]."	**'082 patent:** Cited Claims; Figs. 6-10; 1:21-32, 2:11-20, 3:52-7:53 Written Opinion of the International Searching Authority, Box. No. V and Supplemental Box V Shue, US 2008/0097658, at Fig. 5; [0014], [0039]-[0042], [0097] Shue, PCT 07/01872, at Fig. 5, 10:27-12:11, 26:23-29 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung Hamer & Johnson, *Effects of Errors on Decoupled Control Systems*, NASA Tech. Paper 1184 (July 1978) Webster's New World College Dictionary (4th ed. 2008) (definition of "decouple")
6.	"selectively activat[es/ing]"	'082 patent: claims 1, 11	Indefinite. Alternatively, "automatically activates without a manual switch."	**'082 patent:** Cited Claims; Claims 4, 14; Abstract; Fig. 6-9; 2:35-55, 4:33-42, 4:64-5:8, 5:33-40, 7:11-31 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
7.	"constant vector flat turn motion" "constant vector flat turn"	'082 patent: claim 4, 14 '505 patent: claim 4, 11	"movement along a flight path with a constant speed and constant direction while rotating around the yaw axis without pitching or rolling"	**'505 patent**: Cited Claims; Abstract; Fig. 1-10; 1:33-52, 1:66-2:20; 2:46-4:53, 6:13-7:67 **'082 patent:** Cited Claims; Abstract; Fig. 1-10; 1:33-52, 1:66-2:20; 2:35-4:42, 5:64-7:53 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
8.	"A method to control flat yawing turns of an aircraft while maintaining a constant vector heading across a ground surface, the method comprising:"	'082 patent: claim 11	Preamble is limiting. Indefinite.	**'082 patent:** Cited Claim; Claims 1, 12, 13; Abstract; Figs. 1-10; 1:1-55; 1:66-2:20, 2:7-20, 2:35-4:43, 5:64-7:67 **'505 file history:** Office Action; Amendment & Remarks in Response to Office Action Piasecki at Figs. 5-7, 10, 11 and related text **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
9.	"flat yawing turns"	'082 patent: claims 11, 12, 13	"rotations around the yaw axis without pitching or rolling"	**'082 patent:** Cited Claims; Abstract; Figs. 1-10; 1:33-52; 1:66-2:20; 2:35-4:43, 5:64-7:53, 9:25-62, 10:1-17 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
10.	preambles ("aircraft of claim . . .")	'082 patent: claims 17, 18, 20 '505 patent: claims 17, 19, 20	Plain and ordinary meaning.	**'082 patent**: Cited Claims; Claims 11, 16, 19; **'082 file history:** US and PCT Applications; **'505 patent**: Cited Claims; Claims 11, 16; **'505 file history:** US and PCT Applications; Amendment & Remarks in Response to Office Action **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
11.	"continuously	'505 patent:	"rotates around the yaw axis	**'505 patent:** Cited Claims; Abstract; Figs. 2-5, 8-10; 1:1-55,

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
	moves in a yaw direction"	claims 1, 11	without stopping until it reaches a predetermined yaw angle"	1:66-2:20, 2:46-4:42, 6:27-7:67; **'505 file history:** Office Action; Amendment & Remarks in Response to Office Action Piasecki at Figs. 5-7, 10, 11 and related text **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
12.	"continuously moves in a yaw direction while maintaining the constant vector heading"	'505 patent: claims 1, 11	Indefinite.	**'505 patent:** Cited Claims; Abstract; Figs. 2-5, 8-10; 1:1-55, 1:66-2:20, 2:46-4:42, 6:1-7:67; **'505 file history:** Office Action; Amendment & Remarks in Response to Office Action Piasecki at Figs. 5-7, 10, 11 and related text **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
13.	"flat yaw movement of the aircraft"	'505 patent: claim 11	"rotation around the yaw axis without pitching or rolling"	**'505 patent:** Cited Claim; Abstract; Fig. 1-10; 1:33-52, 1:66-2:20; 2:19-2:20, 2:46-4:53, 6:13-7:67; 9:16-36 **Extrinsic Evidence:** Declaration of Dr. Soon-Jo Chung
14.	"lateral control hatch"	'505 patent: claims 7, 17	Plain and ordinary meaning.	**'505 patent:** Cited Claims
15.	"longitudinal control hatch"	'505 patent: claims 10, 20	Plain and ordinary meaning.	**'505 patent:** Cited Claims
16.	"An aircraft, comprising"	'950 patent: claim 1	Preamble is limiting; "A vehicle (such as an airplane or balloon) for traveling through the air, comprising"	**'950 patent:** Cited Claim; Abstract; FIGS. 1, 2; 1:36-40; 2:35-64; 3:1-4 **'950 file history:** Originally filed claims 1-20; 9/14/2015 Amendment; 10/5/2015 Office Action; 10/21/2015

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
			The recited elements must be part of aircraft not external to it.	Amendment; **Extrinsic evidence:** "Aircraft." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/aircraft
17.	"[the/a] transceiver having a transceiver identity associated with pilot identification information"	'950 patent: claims 1, 9, 13	"The transceiver has a transceiver identity, which is associated with the pilot identification information"	**'950 patent:** Cited Claims; 4:32-36 **'950 file history:** 10/21/2015 Amendment; 2/12/2016 Office Action; 5/12/2016 Amendment; 8/24/2016 Office Action; 10/24/2016 Amendment; 2/7/2017 Office Action; 5/8/2017 Amendment; 7/31/2017 Office Action; 10/2/2017 Amendment; 12/14/2017 Office Action; 3/14/2018 Amendment; 6/1/2018 Office Action; November 1/2018 Amendment **Extrinsic evidence:** *Assignment and Use of Identities In The Maritime Mobile Service*, International Telecommunication Union (October 2019) Available online: https://www.itu.int/dms_pubrec/itu-r/rec/m/R-REC-M.585-8-201910-I!!PDF-E.pdf
18.	"An autonomous vehicle fleet control method, comprising"	'972 patent: claim 1	Preamble is limiting; The method elements are performed in the listed order Fleet is more than one vehicle Undertaken or carried on without outside control	**'972 patent:** Cited Claim; Abstract; Figures 1-5; 1:5-62; 2:21-52; 11:45-55; 12:24-38; 13:9-23; **'972 file history:** Originally filed claims 1-20; 8/18/2021 Office Action; 10/4/2021 Amendment; US Patent Application 2015/0234387 (Mullan); WO 2019/143752 (Welosky); WO 2020/160778 (Islam) **Extrinsic evidence:** "Fleet." Merriam-Webster.com Dictionary, Merriam-

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
				Webster, https://www.merriam-webster.com/dictionary/fleet. "Autonomous." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/autonomous. Parmial Kopardekar, *Unmanned Aerial System (UAS) Traffic Management (UTM): Enabling Low-Altitude Airspace and UAS Operations*, NASA/TM—2014–218299 (April 2014)
19.	"obtaining, by a fleet controller, from a master schedule, a mission for a vehicle of a fleet of autonomous vehicles, wherein the mission is associated with a mission entry of the master schedule" / "obtain[ing], from a master schedule, a mission for a vehicle of a fleet of autonomous vehicles, wherein [the/a] mission is associated with a mission entry of the master schedule"	'972 patent: claims 1, 8, 15	Obtain[ing] is performed by the fleet controller	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:22-62; 8:44-57; 9:65-10:4; 11:45-55; 12:24-38; 13:9-23; 13:30-32
20.	"identify[ing] a flight path associated with the	'972 patent: claims 1, 8,	Identify[ing] is performed by the fleet controller	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 8:64-67; 11:45-61;12:24-44; 13:24-29

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
	mission"	15		
21.	"verify[ing] a usability of the flight path with a unmanned aircraft system (UAS) traffic management (UTM), wherein the UTM performs checking on the flight path for traffic in the flight path, availability of the flight path due to flight restrictions and requirements for use of the flight path"	'972 patent: claims 1, 8, 15	Verify[ing] is performed by the fleet controller; "verify[ing] a usability of the flight path with a system for managing vehicle congestion for unmanned aircraft (UTM), wherein the UTM performs checking on the flight path for (i) vehicles in the flight path, (ii) availability of the flight path due to restrictions on a vehicle operating in a certain area and(iii) requirements that the vehicle or its operation must meet to use the flight path"	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 3:56-4:3; 8:64-9:14; 10:9-31; 11:6-11:29; 11:56-61; 12:39-44; 13:24-28 **'972 file history:** 10/4/2021 Amendment **Extrinsic evidence:** "Traffic." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/traffic. https://www.faa.gov/faq/what-unmanned-aircraft-system-uas Public Law 112-95 Section 331 (Definition of "Unmanned Aircraft System") Available online: https://www.congress.gov/112/plaws/publ95/PLAW-112publ95.pdf Parmial Kopardekar, *Unmanned Aerial System (UAS) Traffic Management (UTM): Enabling Low-Altitude Airspace and UAS Operations*, NASA/TM—2014–218299 (April 2014) Parmial Kopardekar, *Enabling Civilian Low-Altitude Airspace and Unmanned Aerial System (UAS) Operations by UTM* (October 2014) Available online: https://ntrs.nasa.gov/api/citations/20160000433/downloads/20160000433.pdf Parmial Kopardekar, *Safely Enabling Low-Altitude Airspace Operations: Unmanned Aerial System Traffic Management (UTM)* (2015) Available online: https://ntrs.nasa.gov/api/citations/20150006814/downloads/20150006814.pdf https://www.youtube.com/watch?v=iDjZzysw1MY

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
				Marcus Johnson, *UAS Integration Into The US National Airspace* (April 2016) Available online: https://ntrs.nasa.gov/api/citations/20180000390/downloads/20180000390.pdf *FAA UTM Concept of Operations version 1.0* (2018) Available online: https://web.archive.org/web/20221123195622/https://www.nasa.gov/sites/default/files/atoms/files/2018-utm-conops-v1.0-508.pdf Aweiss, *Unmanned Aircraft Systems (UAS) Traffic Management (UTM) National Campaign II*, American Institute of Aeronautics and Astronautics (2018) *Unmanned Aircraft System Traffic Management*, NASA (June 7, 2018) Available online: https://web.archive.org/web/20181206140156/https://www.nasa.gov/ames/utm
22.	"modify[ing] the flight path according to data from the UTM in response to the UTM indicating that the usability of the flight path is not verified"	'972 patent: claims 1, 8, 15	Modify[ing] is performed by the fleet controller	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 3:56-4:3; 8:64-9:14; 10:9-31; 11:6-11:29; 11:56-61; 12:39-44; 13:24-28
23.	"generat[e/ing] vehicle commands according to mission parameters associated with the	'972 patent: claims 1, 8, 15	Generat[e/ing] is performed by the fleet controller	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:22-62; 4:44-52; 8:44-57; 9:65-10:4; 11:22-26; 11:45-55; 12:4-16; 12:24-38; 13:9-23; 13:24-50

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
	mission based on the flight path"			
24.	"maintain[ing] a persistent connection with the vehicle"	'972 patent: claims 1, 8, 15	The fleet controller "maintains a persistent connection between the fleet controller and the vehicle"	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:22-62; 2:33-40; 10:45-54; 11:45-55; 12:24-38; 13:9-23; **'972 file history**: Originally filed claims 1-20; 8/18/2021 Office Action; US Patent Application 2015/0234387 (Mullan) **Extrinsic evidence:** Parmial Kopardekar, *Unmanned Aerial System (UAS) Traffic Management (UTM): Enabling Low-Altitude Airspace and UAS Operations*, NASA/TM—2014–218299 (April 2014)
25.	"sending the vehicle commands to the vehicle using the connection, the vehicle commands causing the vehicle to execute the mission under control of the fleet controller"/ "send the vehicle commands to the vehicle using the connection, wherein the vehicle is configured to receive the vehicle command and execute the mission according to the	'972 patent: claims 1, 8, 15	Sending of vehicle commands is performed by the fleet controller The commands are sent over the persistent connection from the controller to the vehicle	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:22-62; 2:33-40; 4:30-33; 10:45-54; 11:45-55; 11:61-12:16; 12:24-38; 12:48-66; 13:9-23;

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
	vehicle commands"			
26.	"monitor[ing] operation of the vehicle during performance of the mission"	'972 patent: claims 1, 8, 15	Monitor[ing] is performed by the fleet controller	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:22-62; 4:30-37; 10:9-24; 10:45-53; 11:45-55; 12:4-16; 12:24-38; 12:53-66; 13:9-23;
27.	"fleet controller"	'972 patent: claims 1, 8, 15	"A controller external to a group of vehicles that controls the vehicles" Controller is of multiple vehicles	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:5-62; 2:21-52; 3:23-26; 4:23-36; 6:25-29; 10:50-65; 11:45-55; 12:24-38; 13:9-23; 13:32-38 **'972 file history:** Originally filed claims 1-20; 8/18/2021 Office Action; 10/4/2021 Amendment; US Patent Application 2015/0234387 (Mullan); WO 2019/143752 (Welosky); WO 2020/160778 (Islam) **Extrinsic evidence:** "Fleet." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/fleet.
28.	"A fleet controller for controlling an autonomous vehicle fleet, comprising"	'972 patent: claim 8	Preamble is limiting; Fleet is more than one vehicle The recited elements must be part of the fleet controller not external to it; Undertaken or carried on without outside control A controller external to a vehicle that controls the vehicle Specific order of performance	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:5-62; 2:21-52; 3:23-26; 4:23-36; 6:25-29; 10:50-65; 11:45-55; 12:24-38; 13:9-23; 13:32-38 **'972 file history:** Originally filed claims 1-20; 8/18/2021 Office Action; 10/4/2021 Amendment; US Patent Application 2015/0234387 (Mullan); WO 2019/143752 (Welosky); WO 2020/160778 (Islam) **Extrinsic evidence:** "Fleet." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/fleet. "Autonomous." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-

	Term or Phrase	Claim(s)	DJI's Proposed Construction	DJI's Intrinsic and Extrinsic Evidence
				webster.com/dictionary/autonomous. Parmial Kopardekar, *Unmanned Aerial System (UAS) Traffic Management (UTM): Enabling Low-Altitude Airspace and UAS Operations*, NASA/TM—2014–218299 (April 2014)
29.	"An autonomous vehicle fleet control system, comprising"	'972 patent: claim 15	Preamble is limiting; Fleet is more than one vehicle Undertaken or carried on without outside control The system comprises the distinct recited elements Specific order of performance	**'972 patent:** Cited Claims; Abstract; Figures 1-5; 1:5-62; 2:21-52; 3:23-26; 4:23-36; 6:25-29; 10:50-65; 11:45-55; 12:24-38; 13:9-23; 13:32-38 **'972 file history:** Originally filed claims 1-20; 8/18/2021 Office Action; 10/4/2021 Amendment; US Patent Application 2015/0234387 (Mullan); WO 2019/143752 (Welosky); WO 2020/160778 (Islam) **Extrinsic evidence:** "Autonomous." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/autonomous. "Fleet." Merriam-Webster.com Dictionary, Merriam-Webster, https://www.merriam-webster.com/dictionary/fleet. Parmial Kopardekar, *Unmanned Aerial System (UAS) Traffic Management (UTM): Enabling Low-Altitude Airspace and UAS Operations*, NASA/TM—2014–218299 (April 2014)