

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXTRON SPECIALIZED VEHICLES, INC.,
Petitioner,

v.

SZ DJI TECHNOLOGY CO. LTD.
Patent Owner.

IPR2023-01217
Patent 11,462,116 B2

Before FRANCES L. IPPOLITO, NATHAN A. ENGELS, and
JOHN R. KENNY, *Administrative Patent Judges*.

KENNY, *Administrative Patent Judge*.

DECISION
Granting Institution of *Inter Partes* Review
35 U.S.C. § 314

I. INTRODUCTION

Textron Specialized Vehicles, Inc. (“Petitioner”) filed a Petition to institute an *inter partes* review of claims 1–23 (the “challenged claims”) of U.S. Patent No. 11,462,116 B2 (Ex. 1001, the “’116 patent,” “challenged patent”) pursuant to 35 U.S.C. § 311 *et seq.* Paper 1 (“Pet.”). SZ DJI Technology Co. Ltd. (“Patent Owner”) filed a Preliminary Response. Paper 7 (“Prelim. Resp.”). With our authorization, Petitioner filed a preliminary reply addressing Patent Owner’s proposed construction for the claim term “restriction region” (Paper 9, “Prelim. Reply”), and Patent Owner filed a preliminary sur-reply (Paper 10, “Prelim. Sur-reply”).

The Petition, to justify institution of review, must demonstrate a reasonable likelihood that Petitioner would prevail with respect to at least one challenged claim. *See* 35 U.S.C. § 314(a). After considering the Petition, the Preliminary Response, the Preliminary Reply, the Preliminary Sur-reply, and the evidence of record, we determine that the Petition has met this standard and institute *inter partes* review.

A. Related Matters

The parties identify the following related district court litigation (“Related Litigation”): *SZ DJI Technology Co. Ltd. V. Textron Specialized Vehicles Inc.*, Case No. 1:23-cv-00055 (DE). Pet. 2; Paper 6, 2.

B. Challenged Patent

The specification of the ’116 patent (“Specification”) discloses flight restriction strips, flight restriction zones generated by flight restriction strips, and associated flight response measures of a unmanned aerial vehicles relative to the flight restriction strips and/or zones. Ex. 1001, 4:4–8.

Figure 1 of the ’116 patent is shown below:

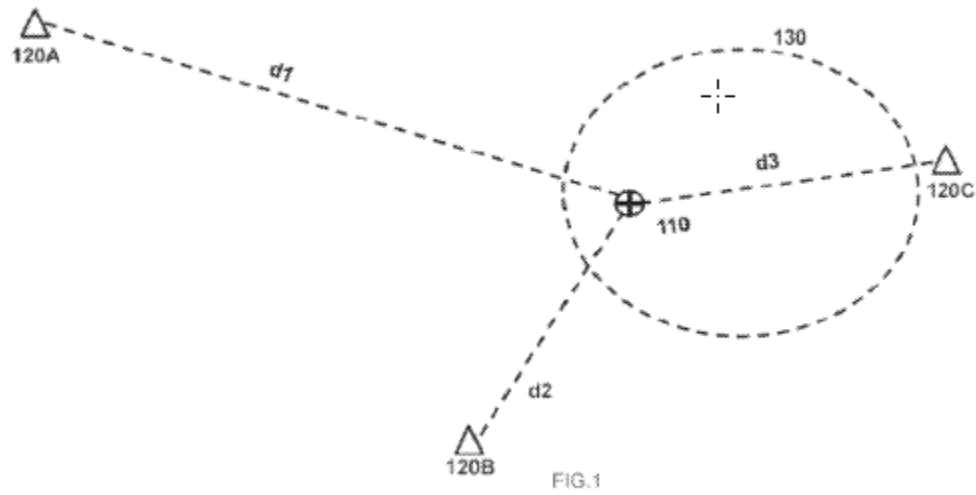


Figure 1 provides an example of unmanned aerial vehicle locations (120A, B, C) relative to a flight restricted region (110). Ex. 1001, 3:6–8, 5:40–43. A “flight-restricted region may be the boundaries of an airport, the border between nations, other jurisdictional borders, or other type of flight-restricted region.” *Id.* at 5:57–60. “A flight-restricted region may include one or more locations where unauthorized aerial vehicles may not fly.” *Id.* at 6:12–13.

The distance between an unarmed aerial vehicle (UAV) and a flight restricted region “may be used to determine whether to take a flight response measure and/or which type of flight response measure to take.” Ex. 1001, 7:29–32. “Examples of flight response measures that may be taken by a UAV may include automatically landing the UAV immediately, providing a time period for an operator of the UAV to land the UAV on a surface after which the UAV will automatically land if the operator has not already landed the UAV, provide an alert to an operator of the unmanned aerial vehicle that the unmanned aerial vehicle is near the flight-restricted region, or any other flight response measure.” *Id.* at 7:32–42. The flight response measures may

be mandatory for all operators of a UAV. *Id.* at 7:43-44. Alternatively, flight response measures may be ignored by an authorized user. *Id.* at 7:43-46.

Figure 6 of the '116 patent is shown below:

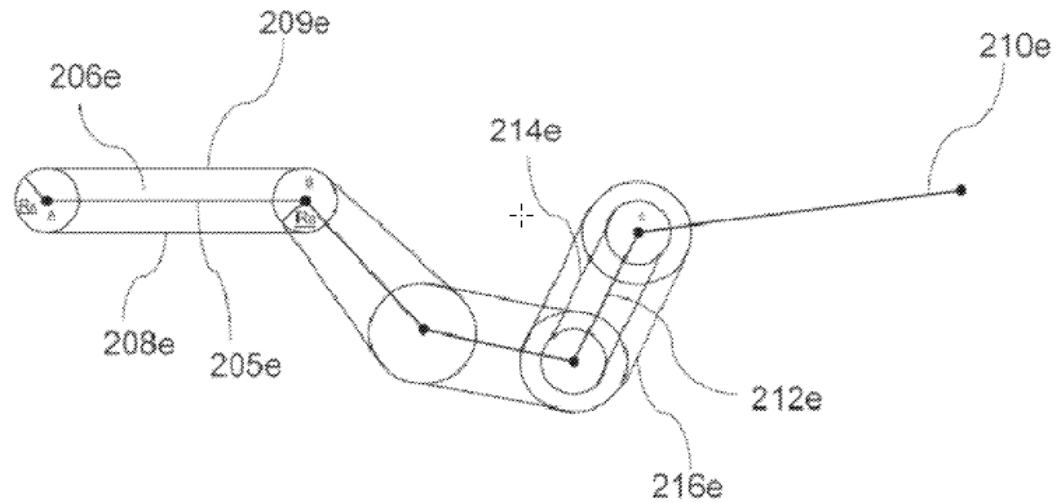


FIG. 8

Figure 6 illustrates a flight restriction zone defined by a plurality of flight restricted strips. *Id.* at 22:65–67. “In some instances, a flight-restricted strip may be defined by two circles each with a respective radius R_1 and R_2 and each respectively centered at the two end points of the flight restriction line. The two circles may be connected by two lines running tangent to the two circles.” *Id.* at 23:19–22. “The area encompassed by the two circles and the tangent lines may represent a flight restricted strip.” *Id.* at 23:22–25. “For example, flight restricted strip 206e is defined by an area encompassed by a circle of radius R_A centered at point A, a circle of radius R_B centered at point B, and lines 208e and 209e tangent to the two circles.” *Id.* at 23:25–28.

The radii may give a width or a buffer such that the UAV cannot fly too close to the flight restricted region. *Id.* at 23:61–63. “For example, the radi[i] may give a width or a buffer to the flight restricted strip such that a UAV cannot fly too close to a national border or an airport.” *Id.* at 23:61–63.

“Alternatively or in conjunction, the radius may be selected depending on parameters of a UAV that interact[s] with flight restricted strips and/or restriction zones.” *Id.* at 23:66–24:2.

Figure 20 of the '116 patent is below:

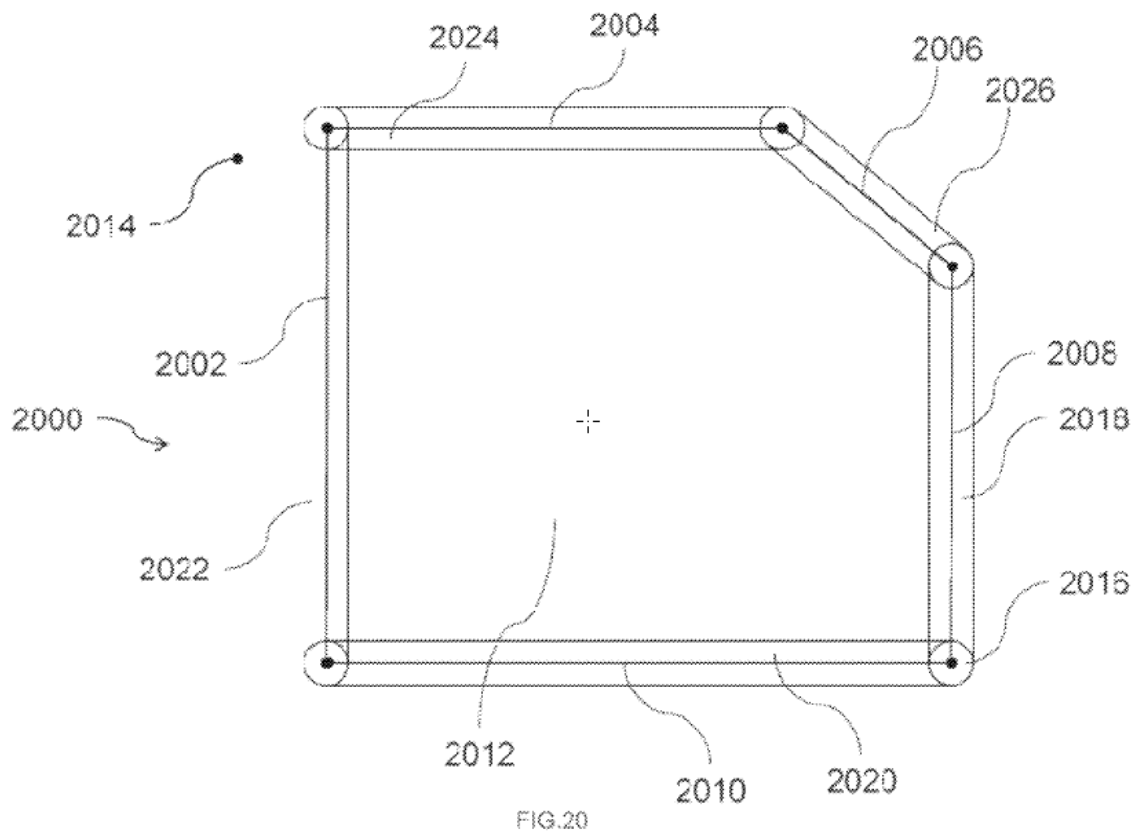


Figure 20 illustrates an irregular polygon area defined by a plurality of flight restricted strips. *Id.* at 3:60–62. In this figure, flight restriction lines 2002, 2004, 2006, 2008, and 2010 define a pentagonal region 2012. *Id.* at 26:12–14, 39–40.

C. Challenged Claims

Petitioner challenges claims 1–23. Pet. 1. Claims 1 is independent and reads:

1. [1p]¹ A method for supporting a vehicle restriction region, comprising:

[1a] receiving, via one or more processors, two or more points associated with the restriction region;

[1b] generating, via the one or more processors, one or more restriction strips along a boundary of the restriction region by connecting adjacent points of the two or more points, [1c] the one or more restriction strips defining at least a portion of the restriction region, [1d] wherein at least one of the restriction strips is configured to have an area encompassed by a first circle, a second circle, and one or more lines running tangent to the first circle and the second circle; and

[1e] automatically causing a ground vehicle to undertake one or more response measures based on at least one of a location or a movement characteristic of the ground vehicle relative to the restriction region.

Ex. 1001, 54:41–58.

D. Asserted Challenges to Patentability and Prior Art

Petitioner challenges claims 1–23 based on the grounds in the table below.

Ground	Claim(s) Challenged	35 U.S.C. §	Reference(s)
1a	1–8, 10–12, 15– 19, 22, 23	102	Humphries ²
1b	1–8, 10–12, 15– 19, 22, 23	103	Humphries
2	13	103	Humphries, Sheha ³

¹ For ease of reference, we include the bracketed designations provided in the Petition for the preamble and limitations of claim 1.

² US 7,164,986 B2 (Ex. 1004).

³ US 8,019,532 B2 (Ex. 1005).

Ground	Claim(s) Challenged	35 U.S.C. §	Reference(s)
3	14, 16, 20, 21	103	Humphries, Jin ⁴
4	14	103	Humphries, Putz ⁵
5	9, 17, 20, 21	103	Humphries, Borugian ⁶

Pet. 5.

Petitioner relies on a declaration with proffered expert testimony from David Hilliard Williams (Ex. 1003).

II. LEVEL OF SKILL AND CLAIM CONSTRUCTION

A. Level of Skill in the Art

Petitioner proposes that an ordinarily skilled artisan would have a B.S. degree in electrical engineering, computer engineering, or equivalent training or job experience, along with 1–2 years of experience in the field of GPS, location-based-services, and/or geofencing. Pet. 11. Further, Petitioner asserts that additional education could compensate for less practical experience and vice versa. *Id.*

Patent Owner has not challenged Petitioner’s definition for an ordinarily skilled artisan. *See generally* Prelim. Resp. At this stage, Petitioner’s definition appears consistent with the level of skill reflected in the Specification and in the asserted prior art references. *See Okajima v. Bourdeau*, 261 F.3d 1350, 1355 (Fed. Cir. 2001). Thus, for purposes of this Decision, we adopt Petitioner’s definition.

⁴ US 2010/0094500 A1 (Ex. 1006).

⁵ US 8,531,293 B2 (Ex. 1007).

⁶ US 6,718,235 B1 (Ex. 1008).

B. Claim Construction

The Petition does not request that we expressly construe any claim term. Pet. 18. The Preliminary Response, however, proposes construing the claim term “restriction region” “as including an area where the vehicle is *excluded* from entry or at least warned upon transgression.” Prelim. Resp. 7. The Preliminary Reply disagrees with Patent Owner’s proposed construction, but does not propose any alternative construction. Prelim. Reply 4. The Preliminary Sur-reply argues that Patent Owner’s proposed construction is correct. Prelim. Sur-reply 2.

To support its proposed construction, Patent Owner argues that the ’116 patent describes restriction regions as undesirable regions for vehicles to enter. Prelim. Resp. 6. Patent Owner further argues that the Specification consistently refers to a restriction region as including an area where the vehicle is excluded from entry or at least warned upon transgression. *Id.* at 7.

Petitioner argues that the term “vehicle restriction region” on its face includes regions that confine vehicles to a region as well as regions that merely generate a response if the vehicle crosses into or out of the region. Pet. Reply 1. Petitioner also argues that the term “restriction region” encompasses the no-fly zones, restricted regions, flight restriction zones, flight limitation regions, and predetermined regions described in the Specification. *Id.* at 1–4.

On this preliminary record, we determine that the term “vehicle restriction region” is not limited to regions that have an area where a vehicle is excluded from entry or warned upon transgression. The dispute between the parties regarding “vehicle restriction region” specifically concerns the meaning of the word “restriction,” in particular whether “restriction” requires

the exclusion of vehicles from entry or a warning upon transgression. Pet. 18–37; Prelim. Resp. 5–24. The parties are not disputing whether the asserted prior art discloses vehicles or regions. Pet. 18–37; Prelim. Resp. 5–24. The Specification teaches that the term “restriction” is not so limited. For example, the Specification discloses that the term “flight *restriction* zone” “may refer to any region in which it is possible to limit or affect operation of an aerial vehicle.” Ex. 1001, 4:8–11 (emphasis added). This disclosure does not require the exclusion of entry of an aerial vehicle or a warning upon transgression. Further, the Specification teaches that flight restriction strip 2104 in region 2100 in Figure 21 may permit flight of the UAV while other flight restriction strips may prevent flight of the UAV. *Id.* at 29:20–22. This disclosure further does not require the exclusion of entry of a vehicle or a warning upon transgression. To the contrary, the Specification describes the latter (an alert) as an optional addition, and, as described above, flight restriction strip 2104 can expressly permit flights. *Id.* at 29:26–31.

In light of the Specification’s definition of a “flight restriction zone” as “any region in which it is possible to limit or affect operation of an aerial vehicle,” it would appear that the proper construction of “vehicle restriction zone” is “any region in which it is possible to limit or affect operation of a vehicle.” Ex. 1001, 4:8–11.

Neither party has provided any evidence regarding the ordinary meaning of the terms “restriction” or “restriction region.” If construction of the term “restriction region” remains in dispute during trial, the parties should provide evidence regarding the ordinary meaning of the term.

III. ANALYSIS OF ASSERTED GROUNDS

A. Ground 1: Asserted Anticipation over Humphries

Petitioner asserts that Humphries anticipates claims 1–8, 10–12, 15–19, 22, and 23. Pet. 5.

1. Humphries

Humphries relates to “device tracking” and “ensuring location adherence for a tracked device . . . by employing geofencing technology.” Ex. 1004, 1:8–12. Humphries discloses setting up a geofenced restriction region by receiving “a set of coordinates” and associating them with “a boundary area.” *Id.* at 2:4-9. Based on the coordinates and the tracked device’s location, “it is determined whether the tracked device is inside the boundary area or outside the boundary area.” *Id.* at 2:9-12. If the device has crossed the geofence, “an alert signal is generated.” *Id.* at 2:13-15. Humphries discloses that a geofenced area (i.e., restriction region) can include a “hysteresis buffer” that adds a radius to the boundary of the geofence. *Id.* at 7:45-50. Humphries’s “hysteresis adds a small buffer area to the normal geographic boundary of a geofence object in order to ensure that erroneous alert messages are not received from a tracked device.” *Id.* at 10:15–19.

2. Claim 1

a. [1p] A method for supporting a vehicle restriction region

Petitioner argues that Humphries discloses methods for creating geofence objects associated with a vehicle. Pet. 18–19. Petitioner further asserts that Humphries discloses that a geofence object is a restriction area because the geofence area corresponds to a geographic region of a map and depicts areas in which tracked objects are to be confined. *Id.* at 19.

Petitioner further argues that Humphries discloses that if the geofence boundary is violated an alert is sent to data center 140. *Id.* at 20.

Patent Owner argues that Humphries's geofenced objects do not constitute a vehicle restriction region because they do not form an area where a vehicle is excluded from entry or warned upon transgression. Prelim. Resp. 6–10. Patent Owner further argues that ensuring vehicles stay within the boundaries of a region is different from keeping vehicles out of a region. *Id.* at 9–10.

Patent Owner also argues that Petitioner inconsistently maps the claimed “restriction region” to the disclosures in Humphries. Prelim. Resp. 10–13. Patent Owner argues that, for some limitations, Petitioner includes the hysteresis buffer as part of the restriction region and, for other limitations, Petitioner does not. *Id.*

We determine that Petitioner has made a sufficient showing for the preamble of claim 1. First, on this preliminary record, we agree with Petitioner that Humphries's geofenced area constitutes a vehicle restriction region because it is a region in which it is possible to limit or affect operation of a vehicle. Pet. 19. Humphries describes the geofenced regions as areas in which tracked objects are to be confined. Ex. 1004, 1:44–50.

Second, we are not persuaded that Petitioner's mapping of the recited vehicle restriction region to Humphries's disclosures is inconsistent. Prelim. Resp. 10–13. Patent Owner argues that, at times, Petitioner maps the recited vehicle restriction region to just the geofence. *Id.* at 10 (citing Pet. 19, 21, 27). Patent Owner asserts that, at other times, Petitioner adds the hysteresis buffer to the vehicle restriction region. *Id.* at 11 (citing Pet. 13, 36). Further, Patent Owner argues that Petitioner maps the vehicle restriction region to just

the geofenced region for limitation 1b because limitation 1b recites restriction strips along a boundary of the restriction region. *Id.* at 11–12. Patent Owner argues, however, that, for limitation 1e, Petitioner has to add the hysteresis buffer to satisfy the recitation of “automatically causing a ground vehicle to undertake one or more response measures based on at least one of a location or a movement characteristic of the ground vehicle relative to the restriction region.” *Id.* at 12. Patent Owner asserts that Petitioner acknowledges that the alert that Humphries generates is when the tracked device is located outside both the geofenced object and the additional area provided by the hysteresis, H. *Id.*

As Patent Owner argues, Petitioner maps the vehicle restriction region to the geofenced area in Humphries: “geofence object(s) associated with a vehicle (which maps to the claimed ‘vehicle restriction region’),” “a geofence object is a restriction region as claimed,” “Humphries’s geofenced objects disclose the claimed ‘vehicle restriction region,’” and “geofenced area (i.e., restriction region).” Pet. 19, 21, 27; Prelim. Resp. 10–11. Other language by Petitioner regarding the mapping of the vehicle restriction region may be less clear. For example, Petitioner asserts that the geofenced region can include a hysteresis buffer that add a radius to the boundary of the geofence. Pet. 12. Petitioner, however, also refers to an alert being generated when a tracked object is outside both the geofence object and the additional region provided by the hysteresis, H. *Id.* at 36. In light of the Petition as a whole, it appears that Petitioner is mapping the vehicle restriction region to just the geofenced area and not the portions of the hysteresis buffer that extend beyond the geofenced area specified by the user. Patent Owner will have an opportunity to address Petitioner’s precise mapping during the cross-examination of

Mr. Williams. In future submissions, the parties should confirm or correct our above understanding of Petitioner's mapping.

As mentioned, Patent Owner argues that mapping the vehicle restriction region to just the chosen geofenced area means that the geofenced area would not satisfy limitation 1e, which reads “automatically causing a ground vehicle to undertake one or more response measures based on at least one of a location or a movement characteristic of the ground vehicle relative to the restriction region.” Prelim. Resp. 11–13; Ex. 1001, 54:41–57. We are not persuaded by that argument because limitation 1e does not require that a response measure occur at the boundary of the restriction region. Ex. 1001, 54:41–57. The limitation merely requires that the response measure be based on the location or movement characteristic of the ground vehicle relative to the restriction region. *Id.* Activating an alarm when the vehicle is H distance (the width of the buffer relative to the boundary restriction region) away from the restriction region is a response measure based on the location of the ground vehicle relative to the restriction region (i.e., the vehicle is H distance away).

Thus, we determine that Petitioner has made a sufficient showing for the preamble of claim 1.⁷

b. [1a] receiving, via one or more processors, two or more points associated with the restriction region

Petitioner argues that in Humphries “mapping application 150 receives two or more coordinates (which map to the claimed ‘two or more points’) associated with a geofence object (‘restriction region’).” Pet. 21. In

⁷ Accordingly, we do not have to determine whether the preamble of claim 1 is limiting.

particular, Petitioner asserts that Humphries discloses that mapping application 150 can be employed by a user at client 160 once logged into datacenter 140 to create geofence applications. *Id.* at 22. Petitioner quotes Humphries's disclosure that "[o]nce the geofence objects are created, the mapping application 150 *resolves the boundaries into a set of coordinates (e.g., longitude and latitude).*" *Id.* at 23 (quoting Ex. 1004, 5:30–34). Petitioner further argues that mapping application 150 resides in datacenter 140 and that datacenter 140 can be implemented on computer system 1000, which includes processor 1003 for executing the functions of mapping application 150. *Id.* Petitioner also asserts that Humphries provides several examples of a geofenced object and associated coordinates, including the one shown in Figure 7B. *Id.* at 24. Further, Petitioner argues that the processor in tracked device 120 receives coordinates from mapping application 150. *Id.* at 25.

Patent Owner asserts that because, in Humphries, mapping application 150 resolves the boundaries into coordinates, mapping application 150 does not receive coordinates from the user and thus processor 1003 is not receiving coordinates or points. Prelim. Resp. 14–15.

We determine Petitioner's showing for limitation 1a is sufficient. First, Patent Owner does not dispute that the processor in tracked device 120 receives one or more points associated with the geofenced area. Prelim. Resp. 16. Second, Patent Owner's assertion that processor 1003 for mapping application 150 does not receive points associated with a boundary because mapping application 150 itself resolves coordinates rests on attorney argument, which is not persuasive. Prelim. Resp. 14–15. It appears from Figure 2 that the user provides points to mapping application 150 to define

geofence objects 220. Ex. 1004, Fig. 2. Even if the user is providing lines to define the boundaries of objects 220, those lines appear to include and be defined by points. *Id.* Thus, based on the current record, we determine that Petitioner's showing for limitation 1a is sufficient for institution. To the extent, however, Patent Owner raises this issue at trial, it would be helpful if both parties would submit evidence directly addressing the issue of whether mapping application 150 receives points from a user.

c. [1b] generating, via the one or more processors, one or more restriction strips along a boundary of the restriction region by connecting adjacent points of the two or more points,

Petitioner argues that tracked device 120 in Humphries generates a hysteresis buffer (a restriction strip) along a boundary of the geofenced object by connecting adjacent points of the two or more points. Pet. 27. Further, Petitioner asserts that the processor of tracked device 120 generates these hysteresis buffers. *Id.* at 29. Petitioner also argues that the processor associated with mapping application 150 generates the recited restriction strip. *Id.*

Patent Owner argues that the processor in tracked device 120 does not generate the hysteresis buffer in Humphries. Prelim. Resp. 16. Patent Owner also argues that Petitioner inconsistently maps the recited restriction strips and restriction region in Humphries. *Id.* at 20.

We addressed the argument regarding Petitioner's allegedly inconsistent mapping of the restriction region in our discussion of the preamble of claim 1.

Regarding the generation of the hysteresis buffer, Patent Owner argues that Petitioner cites a generic description of the hardware employed within

the tracked device. Prelim. Resp. 17–18. Patent Owner asserts that nothing in that passage describes having the tracked device generate the hysteresis buffer. *Id.* at 18. Patent Owner contends that claim 1 of Humphries demonstrates that the set of coordinates includes a hysteresis value and that the set of coordinates are resolved by the mapping application, not the tracked device 120. *Id.* On this preliminary record, Petitioner has provided expert testimony that a processor in Humphries generates the hysteresis buffer. Ex. 1003 ¶¶ 116–122. Further, even if we were to agree with Patent Owner that the processor associated with tracked device 150 does not generate the hysteresis buffer, limitation 1b would still be satisfied with another processor performing that function. The limitation merely requires that one or more processors generate the restriction region and another processor in Humphries’s system (e.g., one associated with application 150 or a combination of processors) would be part of Humphries’s one or more processors. Ex. 1001, 54:41–57.

Patent Owner does argue that the processor that generates the restriction region must be the same processor that receives two or more points as recited in limitation 1a. Prelim. Resp. 19. We, however, are not persuaded by that argument. Limitations 1a and 1b require that one or more processors perform the functions recited by those limitations, but one or more processors could constitute two processors—one that performs the function recited by limitation 1a and another that performs the function recited by limitation 1b. Ex. 1001, 54:41–57. Further, for purposes of this Decision, as set forth in Section III.A.2.c., we determine that Petitioner has sufficiently shown that the processor associated with mapping application 150 receives points as recited by limitation 1a.

For the restriction strips, Patent Owner argues that Petitioner, at times, maps the recited restriction strips to the portion of Humphries's hysteresis buffer that extends outside the geofence object by the width of H. Prelim. Resp. 20. Patent Owner argues that, at other times, Petitioner maps the recited restriction strips to the full hysteresis buffer with a width of 2H. *Id.* In discussing the restriction strips, Petitioner references both a width of H and a width of 2H for the hysteresis buffer. Pet. 32–34. The hysteresis buffer, however, has both a width of H from the geofenced boundary to its boundaries and 2H between its two non-curved boundaries. Ex. 1004, Fig. 7C. Thus, it appears that Petitioner is mapping the restriction strips to the entire hysteresis buffer and that Petitioner's mapping is not inconsistent. If our understanding of Petitioner's mapping is incorrect, however, the parties should correct it in future briefing. Patent Owner will have an opportunity to address this mapping by Petitioner during the cross-examination of Mr. Williams.

We determine that Petitioner has set forth a sufficient showing for limitation 1c.

d. Limitations 1c, 1d, and 1e

Petitioner sets forth how it contends Humphries discloses limitations 1c, 1d, and 1e. Pet. 29–37. For these limitations, Patent Owner disputes that Humphries discloses the recited restriction region. Prelim. Resp. 5. Patent Owner also argues that Petitioner maps the recited restriction region and the recited restriction strips inconsistently. *Id.* at 10–13, 20–24. We addressed all of these arguments in our discussion of the preamble of claim 1 and limitation 1b. After reviewing the preliminary record, we determine that Petitioner's showing for limitations 1c, 1d, and 1e is sufficient.

e. Summary

In sum, we determine that Petitioner has demonstrated a reasonable likelihood of proving that Humphries anticipates claim 1.

3. Claims 2–8, 10–12, and 15–23

The disputed issues for claims 2–8, 10–12, and 15–23 are the same as for claim 1. Prelim. Resp. 25. After reviewing the record, we determine that Petitioner has demonstrated a reasonable likelihood of proving that Humphries anticipates claims 2–8, 10–12, and 15–23.

B. Grounds 2–5

The disputed issues for Grounds 2–5 are the same as for Ground 1. Prelim. Resp. 25–27. After reviewing the record, we determine that Petitioner has demonstrated a reasonable likelihood of prevailing on Grounds 2–5.

IV. CONCLUSION

Petitioner has demonstrated a reasonable likelihood of proving the unpatentability of at least one challenged claim of the '116 patent. We clarify, however, that our analysis is based only on the record as it stands now and that we have not made a final determination regarding the patentability of any challenged claim. Further, no party should rely on any preliminary finding or determination in this Decision nor assume that the evidence cited in this Decision for any preliminary finding or determination will result in a similar finding or determination in the Final Written Decision after a complete record is developed.

V. ORDER

It is

ORDERED that, pursuant to 35 U.S.C. § 314(a) an *inter partes* review of the '116 patent is hereby instituted on the asserted grounds set forth in the Petition; and

FURTHER ORDERED, that pursuant to 35 U.S.C. § 314(c) and 37 C.F.R. § 42.4, notice is given of the institution of a trial, which commences on the entry date of this Decision.

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