

From: [Walters, Chad](#)
To: [Trials](#)
Cc: [Rich, Harrison](#); [Barazesh, Elyar](#); [DL Axon Dedrone IPRs](#); [swadekar@princetonobel.com](#); [jhall@princetonobel.com](#)
Subject: RE: IPR2025-00530 exhibit 1011
Date: Friday, October 31, 2025 2:06:13 PM
Attachments: [image001.png](#)

CAUTION: This email has originated from a source outside of USPTO. **PLEASE CONSIDER THE SOURCE** before responding, clicking on links, or opening attachments.

Dear Patent Trial and Appeal Board,

Thank you for your email. Petitioners have reviewed these issues. Due to a clerical error, Petitioners mistakenly filed a Falk publication as EX1011 instead of the Falk patent (9,805,238) identified as EX1011 in the Petition. In addition, some of citations in the Petition inadvertently referenced paragraph numbers in the Falk publication instead of the Falk patent. Each of the Falk publication cites in the Petition has corresponding disclosure in the Falk patent identified as EX1011.

To address these issues, Petitioners request authorization from the Board to:

- (1) File the Falk patent (9,805,238) as a Replacement EX1011 and have the existing Falk publication initially filed as EX1011 stricken.
- (2) File a Replacement Petition that replaces the existing Falk publication paragraph number cites with corresponding cites to the EX1011 Falk patent as follows:

Petition page no.	Falk publication cite	Replacement Falk patent cite
36	[0007]	2:53 – 3:6
36	[0034]	9:22-37
36	[0003]-[0009]	1:20 – 3:31
37	[0029], [0034]	7:48 – 8:11; 9:22-37
70	[0003]-[0009]	1:20 – 3:31
71	[0029], [0046]	7:48 – 8:11; 12:61 – 13:13

Petitioners and Patent Owner have met and conferred, and Patent Owner does not oppose Petitioners' requests above.

If requested, Petitioners and Patent Owner will make themselves available for a call with the Board to further discuss these issues.

Regards,

Chad Walters

Lead Counsel for Petitioners

Baker Botts L.L.P.

chad.walters@bakerbotts.com

T +1.214.953.6511

F +1.214.661.4511

M +1.214.557.2423

2001 Ross Avenue, Suite 900

Dallas, TX 75201

USA



From: Trials <Trials@USPTO.GOV>

Sent: Thursday, October 23, 2025 12:32 PM

To: Walters, Chad <chad.walters@bakerbotts.com>; Rich, Harrison
<harrison.rich@BakerBotts.com>; andrew.grado@bakerbotts.com; Barazesh, Ellyar
<ellyar.barazesh@bakerbotts.com>; DL Axon Dedrone IPRs
<DLAxonDedroneIPRs@BakerBotts.com>; swadekar@princetonobel.com;
mvella@vellapatentservices.com; jhall@princetonobel.com

Cc: Trials <Trials@USPTO.GOV>

Subject: IPR2025-00530 exhibit 1011

[EXTERNAL EMAIL]

Counsel,

When reviewing the petition in IPR2025-00530, the Panel noted that the document that Petitioner filed as Exhibit 1011 (a published patent application) does not appear to be the same document that Petitioner describes in the Petition as being the Falk reference (an issued patent). It also appears that the Petition may contain a few citations to the potentially incorrect exhibit. For example, the citations to Exhibit 1011 on pages 35 and 36 of the Petition, and the first citation to Exhibit 1011 on page 37 of the Petition, appear to refer to paragraph numbers of the Falk patent application, rather than the issued Falk patent that the Petition identifies as Exhibit 1011.

The parties are directed to meet and confer regarding this issue and to send a joint email to the Board (Trials@uspto.gov) with a proposal to resolve this issue. The meet and confer shall occur on or before November 4, 2025, and the joint email shall be sent to the Board on or before November 5, 2025.

To the extent the parties are unable to reach an agreement on resolving this issue, each party should set forth its position in a single paragraph of 200 words or less in a joint email that shall be sent to the Board on or before November 5, 2025. The Board will then consider the parties' positions and determine whether additional briefing would be helpful.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366



UNITED STATES
PATENT AND TRADEMARK OFFICE ®

Confidentiality Notice:

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.