

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Axon Enterprise, Inc., Dedrone Holdings, Inc., and Skydio, Inc.

Petitioners,

v.

Airspace Systems, Inc.

Patent Owner

Case No. IPR2025-00629

U.S. Patent No. 10,514,711

PATENT OWNER'S RESPONSE (CORRECTED)

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List of Patent Owner Exhibits

Exhibit No.	Description
EX2001	U.S. Army Contract No. W15QKN-17-9-1022
EX2002	Smithsonian, National Air and Space Museum Letter to Mr. Banga dated March 13, 2024
EX2003	Z. Yang and R. Sinnott, "Snake Detection and Classification using Deep Learning," in Proceedings of Hawaii International Conference on System Sciences (2021), https://scholarspace.manoa.hawaii.edu/server/api/core/bitstreams/f9f2de4d-ddaa-4984-9fc3-9bbca4e27247/content
EX2004	Q. Ji, "Object Detection and Recognition," https://sites.ecse.rpi.edu/~qji/CV/ObjectDetRecog2.pdf
EX2005	The National Science Foundation, "How to Radars Work?," https://www.eol.ucar.edu/content/how-do-radars-work
EX2006	Principles of Doppler Radar, http://ww2010.atmos.uiuc.edu/(Gh)/guides/rs/rad/basics/dpmod.rxml
EX2007	https://developer.apple.com/documentation/corelocation/configuring-your-app-to-use-location-services
EX2008	https://developer.apple.com/documentation/corelocation/cllocation
EX2009	https://developer.android.com/develop/sensors-and-location/location/retrieve-current
EX2010	https://developer.android.com/reference/android/location/Location
EX2011	https://www.merriam-webster.com/dictionary/autonomous

Exhibit No.	Description
EX2012	https://dictionary.cambridge.org/us/dictionary/english/-autonomous
EX2013	Declaration of Noah Moore
EX2014	Airspace Interceptor, Fully Autonomous Physical Mitigation System Designed to Detect, Capture or Ram Drone, https://www.airspace.co/airspace-interceptor/
EX2015	Smithsonian National Air and Space Museum, Donate a Personal Item, https://airandspace.si.edu/donate-item
EX2016	Smithsonian National Air and Space Museum, Roger Connor Bio, https://airandspace.si.edu/people/staff/roger-connor
EX2017	Smithsonian National Air and Space Museum, About the Collection, available at https://airandspace.si.edu/collections/about-collection (last visited July 14, 2025)
EX2018	Jointly Proposed Protective Order
EX2019	U.S. Patent App. No. 16/142,452 (from which U.S. Patent No. 10,514,711 issued), as filed (the “’452 App.”)
EX2020	Streaming, Definition of Streaming by Merriam-Webster (2016)
EX2021	Streaming definition and meaning, Collins English Dictionary (2018)
EX2022	R. Wang et al., “An Effective Image Denoising Method for UAV Images via Improved Generative Adversarial Networks,” <i>Sensors</i> vol. 18(7):1985 (2018), doi:10.3390/s18071985.
EX2023	A. Ahmad et al., “Noise and Restoration of UAV Remote Sensing Images.” <i>International Journal of Advanced Computer Science</i>

Exhibit No.	Description
	<i>and Applications</i> , vol. 11, no. 12 (2020) doi:10.14569/ijacsa.2020.0111222
EX2024	Curriculum Vitae of Dr. Nikolos Papalopoulos.
EX2025 ¹	Declaration of Nikolos Papanikolopoulos, Ph.D., in support of Patent Owner's Response and Motion to Amend

¹ In Patent Owner's Response filed on December 19, 2025, Expert Declaration by Dr. Papanikolopoulos was identified as EX2018, which was a labeling error because Jointly Proposed Protective Order was previously filed as EX2018. Accordingly, the Expert Declaration was relabeled as EX2025. References to Expert Declaration are changed herein from EX2018 to EX2025.

I. INTRODUCTION

Petitioners have challenged claims 1-20 of U.S. Patent No. 10,514,711 (the “’711 Patent”) on 22 Grounds. The inventions claimed in the ’711 Patent enable an interceptor unmanned aerial vehicle (UAV) to perform flight control operations based on the relative location of an airborne target such as another UAV, autonomously, without human guidance, and without being controlled by a ground-based navigation system.

Claim 12 recites “autonomously navigating” and it is the only claim with respect to which Patent Owner respectfully submits this Corrected Response. In a Corrected Motion to Amend that is filed concurrently, Patent Owner proposes respective substitute claims for claims 1-4, and 8-20. Patent Owner requests that claims 5-7 be cancelled. The request to amend claims 1-4 (corresponding proposed substitute claims 21-24), 8-11 (corresponding proposed substitute claims 25-28), and 13-20 (corresponding proposed substitute claims 30-37) is non-contingent. Proposed substitute claim 29 corresponds to claim 12; the request to amend claim 12 is contingent upon the Board not finding claim 12 patentable.

Petitioners have challenged claim 12 only under 5 of the total asserted 22 Grounds. Those 5 Grounds are: Ground 1, Ground 9-10, and Grounds 17-18 (Pierce in view of Kumar, further in view of Laufer). The Institution Decision did not address claim 12 under these 5 Grounds specifically. *See* Paper 16 (Institution

Decision) at 22-23. Each of these 5 Grounds fail for not disclosing, *inter alia*, a reference aerial vehicle that can navigate autonomously towards a specified location, i.e., navigate without human guidance and without guidance from another ground-based and/or aerial system. *See* EX2025 §§ VII, X.

II. THE '711 PATENT

A. Administrative Overview

The '711 patent issued from U.S. Patent Application No. 16/142,452 (the '452 App."), that was filed on September 26, 2018. EX1001, face page. The '452 App. is a continuation-in-part of U.S. Patent Application No. 15/729,581 (the '581 Appl.), filed on October 10, 2017. The '452 App. also claims priority to U.S. Provisional Patent Application No. 62/566,449, filed on October 1, 2017, and to U.S. Provisional Patent Application No. 62/405,972, filed on October 9, 2016. *See* EX1001, 1:7-23; EX2025 § VIII(A).

B. Prosecution History

During the prosecution of the '452 App., in the first Non-Final Office Action mailed on November 23, 2018, claims 1-11, 14, 19, and 20 were rejected under 35 U.S.C. § 103 over several prior art references. Claims 12, 13, and 15-18 were indicated as reciting allowable subject matter. *See* EX1002 at 104-115. In a response filed on February 20, 2019, Applicant amended various claims, including claim 1. *See id.* at 158-163.

A Final Office Action was mailed on March 12, 2019, in which claims 1-11, 14, 17, 19, and 20 were rejected under 35 U.S.C. § 103 over some previously cited and some new prior art references. Claims 12, 13, and 15, 16, 18 were indicated as reciting allowable subject matter. *See* EX1002 at 165-177. In a response filed on July 11, 2019, Applicant incorporated the subject matter recited in claim 12, that was indicated as allowable, into independent Claims 1, 19, and 20. *See id.* at 215-221.

The Notice of Allowance issued thereafter on August 2, 2019. *See id.* at 222-229. In the reasons for allowance, the Examiner stated that the limitations recited in original claim 12, now incorporated into claims 1, 19, and 20, were not taught or suggested by the prior art of the record. *See id.* at 227; EX2025 § VIII(B).

C. Subject Matter

The '711 Patent discloses and claims techniques for “performing a flight control operation of a reference aerial vehicle” based on the three dimensional (3D) relative location of a target that it detects using machine learning. *See* EX1001, Abstract, 31:10-33:2. In particular, the '711 patent notes that as the use of UAVs, also known as drones, would proliferate, some UAVs may be “used to carry contraband,” “to perform unauthorized surveillance,” and even to commit acts of terrorism. *See id.*, 3:3-11. To mitigate such risks by malicious UAVs, the

'711 patent explains, that it may be necessary to deploy an interceptor UAV to interdict a malicious UAV (i.e., a target), e.g., “intercept, capture, and transport away a UAV that has entered a restricted area.” *Id.*, 3:11-21.

Typically, however, because such interceptor UAVs were controlled by human flight controllers, a number of problems arose when attempting to have the UAV intercept a target. First, the human had to “have a visual sight” of the target to capture it. *Id.*, 1:27-31. Second, “challenges arose in circumstances where a trained human user is unavailable or unable to react quickly enough to perform a desired flight maneuver.” Additionally, “if communication between the [interceptor UAV] and the flight controller is lost or becomes unreliable, the [interceptor UAV] may be unable to perform a desired flight operation.” *Id.*, 1:31-36. An additional challenge is manually controlling a UAV when the target, such as another UAV, is also moving. *See id.*, 3:21-25. For these reasons, the Patent explains “it may not be desirable to manually control the interceptor [UAV.]” *Id.*, 3:25-26.

Patent Owner not only recognized this critical problem, but also devised an innovative and multi-faceted solution—an “interceptor aerial vehicle [that] is able to autonomously track and fly to the target UAV using machine vision based on images captured by a camera of the interceptor aerial vehicle.” *Id.*, 3:27-30. Patent Owner not only conceived and patented this solution; it also built an embodiment

of this invention that it supplied to the United States Army in 2018, as a first-of-its-kind, fully autonomous interceptor UAV. To build this revolutionary autonomous interceptor UAV, Patent Owner entered into an agreement with the U.S. Army under which it received over \$3.5 million in funding from the U.S. Army's "Defense Innovation Unit – Experimental (DIUs) Commercial Solutions Offering (CSO)." EX2001, Article 1, § A. This agreement described Patent Owner's technology as "**cutting edge** counter unmanned aerial system (cUAS) robotic 'interceptor drone.'" *Id.* The Patent Owner's UAV was accepted for inclusion in the Smithsonian National Air and Space Museum's collection of historically significant aircraft in March 2024. EX2002.

Patent Owner's innovative and multi-faceted solution, as disclosed and claimed in the '711 patent and as embodied in the UAV interceptor delivered to the US Army and accepted into the Smithsonian's collection, has a number of important features. The first one is the **on-board machine-learning based detection** of a target from the images captured by a UAV used for interdiction, referred to in the '711 patent as the "reference UAV." *See* EX1001, 17:25-27; *see also, id.*, 13:26-35, FIG. 3A.

Another important feature of the '711 patent concerns the determination/estimation of the three-dimensional relative location of the target with respect to the interceptor ("reference UAV"), including the distance between

the reference UAV and the target. *See id.*, 17:39-49. The '711 patent teaches performing such distance estimation by comparing the size of the target within the captured image to the size of the image, because a “target that is further away will appear smaller in the image as compared to the target that is closer and thus the size of the target within the image can be used as a proxy for distance to the target.” *Id.*, 17:42-49.

A significant challenge is presented, however, when the actual target size is not known *a priori*. This is likely the case when the target is another UAV, because UAVs can vary in shapes and sizes significantly. *See id.* 17:49-53. To address this problem, the '711 patent teaches using a “machine learning model [on-board, that] has been trained using different examples of types of aerial vehicles (e.g., different models, types, manufacturers, sizes, etc.) to be able to classify and **identify the specific type** of the detected target aerial vehicle and a corresponding size profile corresponding to the specific type.” *Id.*, 17:53-58. Then, “a measurement of the target within the image,” e.g., one or more size parameters of a bounding box associated with the target, “can be mapped to a distance value based on a determined size corresponding to the detected type/classification of the target.” *Id.*, 17:61-67.

Yet another important feature of the '711 patent's pertains to its automated navigation. In many situations, communication between a UAV and a ground

station can be unavailable or unreliable. The inventors of '711 patent recognized that in such situations, "the aerial vehicle may be unable to complete a desired flight operation." *Id.* 1:34-37. To address this problem, the UAV of the '711 patent does not rely on receiving flight control instructions from a ground station. Rather, the UAV can operate **autonomously**, i.e., it can **self-determine** the speed, elevation, flight-path, etc., based on the relative location of the target that the UAV determined.

To this end, the '711 patent discloses a UAV 301 having a CPU "configured to control the overall operation of UAV 301." *Id.* 9:25-27. The "CPU may be configured to perform one or more **flight decisions** for the UAV" by providing "one or more flight commands" that "may include a specified speed for the UAV, a specified flight height for the UAV, a particular flight path for the UAV, etc." *Id.* 9:38-43, 16:49-55 (when a target is detected, "a flight direction and/or speed of an interceptor aerial vehicle are automatically and autonomously adjusted"), FIGS. 3, 4. Claim 12 recites the autonomous navigation feature. See EX2025 § VIII(C).

III. CLAIM CONSTRUCTION

In Patent Owner's Preliminary Response, for several claim terms recited in independent claims 1, 19, and 20, Patent Owner proposed respective constructions that Patent Owner believed were proper interpretations of those claim terms. See Paper 11 at 11-17. Patent Owner also presented arguments in support of the

constructions it presented. *See id.* The Board did not find Patent Owner's arguments persuasive. *See* Paper 16 at 10-11. Accordingly, Patent Owner acknowledges that all claim terms, including those recited in claim 12, shall be interpreted according to their ordinary and customary meaning.

Claim 12 recites “**autonomously** navigating the reference aerial vehicle.” The '711 patent discloses a UAV 301 having a CPU “configured to control the overall operation of UAV 301.” *Id.* 9:25-27. The “CPU may be configured to perform one or more **flight decisions** for the UAV” by providing “one or more flight commands” that “may include a specified speed for the UAV, a specified flight height for the UAV, a particular flight path for the UAV, etc.” *Id.* 9:38-43, 9:49-51 (in some “embodiments, the **CPU is configured to autonomously fly UAV 301**”), 16:49-55 (when a target is detected, “a flight direction and/or speed of an interceptor aerial vehicle are automatically and autonomously adjusted”), FIGS. 3, 4.

Merriam-Webster dictionary defines “autonomous” as “undertaken or carried on **without outside control**.” Cambridge dictionary defines “autonomous” as “independent and having the power to **make your own decisions**.” In light of these definitions and the specification of the '711 patent, the plain and ordinary / customary” meaning of “autonomously navigating the reference aerial vehicle” is

making navigation decisions by the reference aerial vehicle by-itself, without outside control. EX2025 § IX.

IV. EACH OF GROUNDS 1, 9, 10, 17, AND 18 FAILS TO DEMONSTRATE UNPATENTABILITY OF CHALLENGED CLAIM 12 BY A PREPONDERANCE OF THE EVIDENCE

A. Ground 1

Ground 1 uses the combination of Beard and Laufer (hereinafter the “Beard-Laufer combination”) in alleging invalidity of claim 12. *See* Pet. at 34; EX1003, ¶ 138. Contrary to the allegations in Petition, *see id.* at 10-13, a person of ordinary skill in the art (“POSITA”) would not be motivated to combine Beard and Laufer. Furthermore, the Beard-Laufer combination does not show all of the limitations recited in claim 12.

1. A POSITA Would Not Combine Beard and Laufer

In its Preliminary Response, Patent Owner presented several reasons for which a POSITA would not combine Beard and Laufer. *See* Paper 11 at 18-24. Patent Owner acknowledges that the Board considered Patent Owner's arguments pertaining to the limitations recited in independent claims 1, 19, and 20, and did not find those arguments persuasive. *See* Paper 16 at 17-21. With respect to claim 12, however, a POSITA would have nevertheless not combined Beard and Laufer, at least because the proposed combination does not provide a reasonable expectation of achieving **autonomous navigation** of an aerial vehicle, and thus the

claimed invention of claim 12. *Intelligent Bio-Systems v. Illumina Cambridge*, 821 F. 3d 1359, 1367 (Fed. Cir. 2016); *Personal Web Technologies, LLC v. Apple, Inc.*, 848 F. 3d 987, 993-94 (Fed. Cir. 2017); *Belden Inc. v. Berk-Tek LLC*, 805 F.3d 1064, 1073 (Fed. Cir. 2015); *see* Paper 11 at 21.

The proper meaning of “autonomously navigating the reference aerial vehicle” is making navigation decisions by the reference aerial vehicle by-itself, without outside control. *See supra* § III.

Laufer discloses an “interdiction system 100” that includes a “central controller 115.” EX1010, ¶ 22, FIG. 1. As seen in FIG. 1, the central controller 115 is not on-board a UAV, such as UAVs 122A-C, 124A-C, 140A-B depicted in FIG. 1. In fact, Laufer states that in some embodiments, the “central controller 115 is connected to stationary components of interdiction system 100 by a **wired connection**, for example 10/100 and Gigabit Ethernet connections.” *Id.* ¶ 30. Laufer further states that the “[c]entral controller 115 can be connected to interceptor aircraft 140A-140B through a wireless connection.” *Id.* ¶ 30. A central controller that can have a “wired connection” to certain stationary components and a wireless connection to a UAV is not and cannot be on-board a UAV. Thus, the central controller 115 is not a part of a UAV disclosed by Laufer.

Laufer also states that central controller 115 can “determine the location at which ... the target and the interceptor aircraft will intersect,” i.e., the “interception location 425.” *Id.* ¶ 39. Thereafter:

Central controller 115 uses autopilot command module 440 to **generate autopilot aircraft commands 445** based on interception location 425 and the interceptor air craft dynamics model. Central controller 115 uses autopilot command module 440 to solve for the set of autopilot aircraft commands 445 to cause the interceptor aircraft to fly to interception location 425.

Id. ¶ 40.

Thus, in Laufer's system, navigation of the UAV, so that it may fly to the interception location, is accomplished under the control of the central controller. Laufer's autopilot commands may not be provided by a human, and may instead be generated by a computer, such as one provided in Laufer's autopilot command module. But, those autopilot commands are generated by the central controller and not by UAV. Thus, Laufer's UAV does not navigate itself. Accordingly, Laufer does not teach or suggest “autonomously navigating the reference aerial vehicle,” as claim 12 recites.

Moreover, **Laufer's central controller** having wired connections to stationary components, such as “Doppler radars” and “fixed cameras,” *see id.*, ¶ 29, must be ground based and **cannot be located aboard a UAV**. Therefore, to a

POSITA Laufer describes the very sort of conventional interceptor UAV operation that the '711 inventors had in mind as being inoperable "if communication between the [interceptor UAV] and the flight controller is lost or becomes unreliable." EX1001, 1:31-35. The Beard-Laufer combination does not solve this problem, because it sends navigation instructions to a UAV from a ground-based central controller.

Therefore, a POSITA **would not have expected this combination to succeed in providing autonomous navigation** for a UAV, i.e., in achieving the invention of claim 12. *Intelligent Bio-Systems*, 821 F. 3d at 1367; *Personal Web Technologies*, 848 F. 3d at 993-94; *Belden Inc.*, 805 F.3d at 1073. At least for the foregoing reason, a POSITA would not have combined Beard and Laufer. Notwithstanding the lack of motivation to combine, the Beard-Laufer combination fails to teach or suggest certain limitations of claim 12, as discussed below.

2. Claim 12

Claim 12 depends from claim 1 and recites "receiving a geographical location associated with the target" and "autonomously navigating the reference aerial vehicle towards the received geographical location." EX1001, 32:1-7.

For claim 12, in Ground 1, Beard does not teach, and Petitioners do not allege that Beard teaches, "autonomously navigating the reference aerial vehicle." See Pet. at 34; EX1003, ¶ 138. Even if Laufer is combined with Beard, Laufer also

does not teach or suggest this limitation, and to the contrary, teaches only the known, conventional, ground-control based navigation.

This is because, as I discuss above, Laufer's "[c]entral controller 115" provides "autopilot aircraft commands 445 to cause the interceptor aircraft to fly to interception location 425." EX1010 ¶ 40. But as I also explained above, Laufer's central controller having **wired connections to stationary components**, such as "Doppler radars" and "fixed cameras," and a wireless connection to interceptor aerial vehicle, *see id.*, ¶¶ 29, 30, must be ground based and **cannot be located aboard a UAV**. Therefore, Laufer also does not teach or suggest "autonomously navigating the reference aerial vehicle," as claim 12 recites. Thus, the Beard-Laufer combination does not teach all of the limitation of claim 12.

B. Ground 9 and 10

Petitioners allege that the combination of Pierce and Laufer in Ground 9 and Pierce, Kumar, and Laufer in Ground 10 renders claim 12 obvious. As in Ground 1, in Grounds 9 and 10 also Petitioners rely only on Laufer as allegedly teaching the "autonomously navigating the reference aerial vehicle" limitation of claim 12. Pierce and Kumar, individually and in combination, do not teach this limitation. Petitioners do not allege otherwise. *See* Pet. at 71; EX1003, ¶ 224.

Here again, because Laufer's central controller that provides the autopilot command to an aerial vehicle is ground based, and cannot be located on the aerial

vehicle, a POSITA would not have expected the combinations proffered in these grounds to achieve autonomous navigation of the reference aerial vehicle.

Therefore, a POSITA would not have combined Laufer with Pierce or with Pierce and Kumar.

Moreover, for the same reasons discussed above for Ground 1, even in the proffered combinations, Laufer fails to cure what Pierce and Kumar lack, because Laufer also does not teach navigation by the reference aerial vehicle by-itself, i.e., “autonomously navigating the reference aerial vehicle,” as claim 12 recites.

Therefore, the Pierce-Laufer and Pierce-Kumar-Laufer combinations do not teach all of the limitation of claim 12.

C. Grounds 17 and 18

As in Ground 1, in Grounds 9 and 10 also Petitioners rely on Laufer as allegedly teaching the “autonomously navigating the reference aerial vehicle” limitation of claim 12. Pierce, Kumar, and Sahasrabudhe, individually and in combination, do not teach this limitation. Petitioners do not allege otherwise. *See* Pet. at 80; EX1003, ¶¶ 245-247. Therefore, for the reasons provided in connection with Grounds 1, 9, and 10, a POSITA would not be motivated to combine Laufer with Pierce, Kumar, and Sahasrabudhe as suggested by Petitioners.

Furthermore, even in the suggested combinations, Laufer does not cure what Pierce, Kumar, and Sahasrabudhe fail to teach or suggest, because Laufer also does

not teach navigation by the reference aerial vehicle by-itself, i.e., “autonomously navigating the reference aerial vehicle,” as claim 12 recites. Therefore, the Pierce-Sahasrabudhe-Laufer and Pierce-Kumar-Sahasrabudhe-Laufer combinations also do not teach all of the limitation of claim 12.

Accordingly, Patent Owner respectfully submits that claim 12 is patentable.
EX2025 § X.

V. CONCLUSION

For the foregoing reasons, Patent Owner respectfully submits that Petitioners do not demonstrate by preponderance of the evidence that claim 12 is unpatentable. Therefore, Patent Owner respectfully request that the Board find claim 12 patentable.

Dated: December 20, 2025

Respectfully submitted,

/Suhrid Wadekar/

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Certificate of Compliance with Word Count

Pursuant to 37 C.F.R. § 42.24(d), I certify that this Patent Owner's Response complies with the type-volume limits of 37 C.F.R. § 42.24(b)(1) because it contains 3,226 words (excluding the parts of this Patent Owner's Response that are exempted by 37 C.F.R. § 42.24(a)), according to the word processing system used to prepare this Patent Owner's Preliminary Response.

Dated: December 20, 2025

Respectfully submitted,

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Certificate of Service

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing PATENT OWNER'S RESPONSE (CORRECTED) and its additional exhibits were served via email on December 20, 2025 (per counsel's consent) to lead and backup counsel of record for Petitioners as follows:²

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Dated: December 20, 2025

² Patent Owner's Response (filed on December 19, 2025) and its additional exhibits were not served.