

April 30, 2026

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

PhotonSky Technologies, Inc.
1200 Harbor Way
San Diego, CA 92121

Re: Patent Infringement – Cease and Desist Demand

Dear PhotonSky Technologies, Inc.:

This firm represents **SkyWave Drones Ltd.** ("SkyWave") with respect to its intellectual property rights. We are writing to demand that you immediately cease and desist from infringing our client's patented technology.

SkyWave owns valuable intellectual property rights in **U.S. Patent Nos. 10,987,654 and 11,123,456**, titled "Autonomous Obstacle-Avoidance System for Unmanned Aerial Vehicles" and "Adaptive Flight Path Optimization Using LiDAR Sensor Fusion," respectively (collectively, the "Patents"). The Patents were duly issued by the United States Patent and Trademark Office on December 8, 2021, and April 5, 2022, and are assigned to SkyWave.

We have discovered that your **Falcon-X quadcopter drone** incorporates an obstacle-avoidance module and adaptive flight-path algorithms that practice each and every limitation of independent Claim 1 of the '654 Patent and independent Claim 5 of the '456 Patent. Specifically, the Falcon-X system employs (1) a forward-facing LiDAR array with 200 k pts/s resolution, (2) a real-time voxel occupancy grid updated at 50 Hz, and (3) dynamic rerouting based on confidence thresholds—all features claimed in the Patents.

Evidence of this infringement, including a side-by-side claim chart and annotated teardown photographs, is attached as **Exhibit A**.

Your unauthorized use of our client's patented technology constitutes patent infringement under 35 U.S.C. § 271. Patent infringement subjects you to significant legal liability, including injunctive relief, treble damages for willful infringement, and attorneys' fees.

Therefore, we demand that you:

1. **IMMEDIATELY CEASE AND DESIST** from all manufacture, use, importation, sale, and offer for sale of the Falcon-X drone and any other products that infringe the Patents;
2. **DESTROY OR PERMANENTLY REMOVE** all infringing inventory, marketing materials, manuals, firmware, and promotional content within your possession, custody, or control;
3. **PROVIDE A FULL ACCOUNTING** of all units sold, revenues, and profits derived from the infringing products since launch; and
4. **CONTACT US WITHIN FOURTEEN (14) DAYS** to discuss a possible license if you wish to continue using the patented technology.

Failure to comply with these demands will leave us no alternative but to pursue all available legal remedies, including immediate legal action for injunctive relief, damages, profits, and attorneys' fees.

This is a serious matter requiring your immediate attention. **Govern yourself accordingly.**

You must respond within **14 days** of the date of this letter.

Sincerely,

/Karen L. Brooks/
Karen L. Brooks, Esq.
IP Enforcement Counsel
Brooks & Rivera LLP

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Attorney for SkyWave Drones Ltd.

