
RE: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

From Josh Griswold <griswold@fr.com>

Date Fri 2/28/2025 4:35 PM

To Jason Charkow <jcharkow@daignaultiyr.com>; Stephanie Mandir <smandir@daignaultiyr.com>; Taylor Lepore <tlepore@daignaultiyr.com>; IPR12189-0092IP1 <IPR12189-0092IP1@fr.com>; PTAB Inbound <PTABInbound@fr.com>; Rishi Gupta <rgupta@fr.com>; Yao Wang <ywang@fr.com>; Rick Bisenius <bisenius@fr.com>

Cc PV <PVLit@daignaultiyr.com>

Stephanie,

The error Dr. Galton mentioned in his model was mistake that caused it to not load the intended JFET model. He had just told us of it during our meeting with him Thursday. As he testified, he's run the simulation again and verified the error doesn't change the opinions he's offered.

We would like to provide you simulation outputs, like in his declaration, but using the correct JFET model so you can account for it in your POR. We'd agree to extend your POR date to the 13th and allow you to ask Dr. Galton questions about the updated simulation output, under oath, prior to his '177 and '528 depo. We expect to have the update ready to serve on you Monday.

We'll prepare the stipulation to move the '342 POR deadline and send it over.

Best,
Josh