

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXAS INSTRUMENTS INCORPORATED,
Petitioner

v.

PARKERVISION, INC.,
Patent Owner

Case IPR2024-00934
Patent 7,496,342

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits the following objections to evidence filed with Patent Owner's Response of April 21, 2025.

<u>Evidence</u>	<u>Objections</u>
2021	Irrelevant, Misleading, Improper Testimony, Hearsay (FRE 401-403, 702, 703, 802) Petitioner objects to the admissibility of Exhibit 2021 under FRE 702 and 703, because it contains opinions that are conclusory, do not disclose supporting facts or data, and are based on unreliable facts, data, or methods. Petitioner objects to the admissibility of Exhibit 2021 under FRE 702-703 and 802 because is relied on for statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2021 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403.
2025	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002) Petitioner objects to the admissibility of Exhibit 2025 under FRE 802 because it includes statements (by way of drawings) that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2025 as containing information that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2025 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2025 under FRE 1002 for lack of completeness because the exhibit lacks a full table of contents.
2031	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)

	Petitioner objects to the admissibility of Exhibit 2031 under FRE 802 because it includes statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2031 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2031 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2032	Irrelevant, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2032 under FRE 802 because is relied on for statements that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2032 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2032 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2035	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002) Petitioner objects to the admissibility of Exhibit 2035 under FRE 802 because it includes statements (by way of drawings) that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2035 as containing information that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2035 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2035 under FRE 1002 for lack of completeness

	because the exhibit lacks a full table of contents and other indications of the operation of the FET and the operation of different types of FETs.
2037	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002) Petitioner objects to the admissibility of Exhibit 2037 under FRE 802 because it includes statements (by way of drawings) that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2037 as containing information that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2037 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2037 under FRE 1002 for lack of completeness because the exhibit lacks a full table of contents and other descriptions of sample and hold and other sampling techniques.
2038	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 1002) Petitioner objects to the admissibility of Exhibit 2038 under FRE 802 because it includes statements (by way of drawings) that constitute inadmissible hearsay. The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Petitioner also objects to Exhibit 2038 as containing information that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2038 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2038 under FRE 1002 for lack of completeness because the exhibit lacks a full table of contents and other indications of the performance of the JFET and other types of FETs.

For at least these reasons, Petitioner objects to Exhibit(s) 2021, 2025, 2031-2032, 2035 and 2037-2038.

Respectfully submitted,

Dated: April 28, 2025

/Rishi Gupta/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e), the undersigned certifies that on April 28, 2025, a complete and entire copy of this Petitioner's Objections to Evidence was provided by email to the Patent Owner by serving the correspondence email addresses of record as follows:

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