

IPR2024-00934
Patent No. 7,496,342

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXAS INSTRUMENTS INC.,
Petitioner,

v.

PARKERVISION, INC.,
Patent Owner.

IPR2024-00934
Patent 7,496,342 B2

**PATENT OWNER'S SUPPLEMENTAL EVIDENCE IN
RESPONSE TO PETITIONER'S OBJECTIONS TO EVIDENCE**

PATENT OWNER’S EXHIBIT LIST

Exhibit No.	Description
2001	Complaint, ParkerVision, Inc. v. Texas Instruments Inc., Case No. 6:23-cv-00384-ADA (WDTX)
2002	Agreed Scheduling Order, ParkerVision, Inc. v. Texas Instruments Inc., Case No. 6:23-cv-00384-ADA (WDTX)
2003	Dani Kass, “Catching Up On Patent Litigation With Judge Albright,” LAW360 (Mar. 14, 2023)
2004	Sonrai Memory Ltd. v. Kingston Tech. Co., Inc., Case No. 6:21-cv-1284-ADA, Order Denying Kingston Tech. Co. and Kingston Tech. Corp.’s Opposed Motion to Stay Pending Resolution of Inter Partes Review, Dkt. 94 (W.D. Tex., Oct. 18, 2022)
2005	Docket Order, Kerr Machine Co. d/b/a Kerr Pumps v. Vulcan Industrial Holdings, LLC, No. 6:20-cv-00200 (W.D. Tex. Aug. 2, 2020)
2006	Statutory Disclaimer Under 37 CFR 1.321(a) and Electronic Acknowledgment Receipt dated August 28, 2024
2007-2020	RESERVED
2021	Declaration of Dr. David Ricketts
2022-2024	RESERVED
2025	Excerpts from Howe, R. et al., Microelectronics: An Integrated Approach
2026-2030	RESERVED
2031	Excerpt of Graf, R., Modern Dictionary of Electronics, Seventh Edition
2032	Rofougaran, A., et al., A 1 GHz CMOS RF Front-End IC for a Direct Conversion Wireless Receiver
2033	U.S. Patent No. 6,061,551
2034	Deposition Transcript of Ian Galton, dated March 12, 2025
2035	Sedra, Microelectronic Circuits (4th ed. 1998)
2036	Deposition Transcript of Ian Galton, dated February 28, 2025

IPR2024-00934

Patent No. 7,496,342

Exhibit No.	Description
2037	CMOS Analog Circuit Design
2038	Sze, Physics of Semiconductor Devices (2nd ed. 1981)
2039	Deposition Transcript of Ian Galton, dated April 14, 2025
2040	Email dated 2/28/2025 from Petitioner to Patent Owner
2041	Email dated 3/4/2025 from Patent Owner to PTAB
2042	Full Table of Contents for Excerpts from Howe, R. et al., Microelectronics: An Integrated Approach
2043	Full Table of Contents for Sedra, Microelectronic Circuits (4th ed. 1998)
2044	Full Table of Contents for CMOS Analog Circuit Design
2045	Full Table of Contents for Sze, Physics of Semiconductor Devices (2nd ed. 1981)

On April 28, 2025, Petitioner served Objections to Evidence. *See* Paper 25. Pursuant to 37 C.F.R. § 42.64(b)(2), Patent Owner hereby responds to Petitioner's objections by serving supplemental evidence within ten (10) business days of service of the objections. In response to Petitioner's Objections to Evidence, Patent Owner hereby supplements evidence by providing the following Exhibits.

In response to Petitioner's Objection to Exhibit 2025, Patent Owner enters **Exhibit 2042** which contains the full table of contents for Exhibit 2025.

In response to Petitioner's Objection to Exhibit 2035, Patent Owner enters **Exhibit 2043** which contains the full table of contents for Exhibit 2035.

In response to Petitioner's Objection to Exhibit 2037, Patent Owner enters **Exhibit 2044** which contains the full table of contents for Exhibit 2037.

In response to Petitioner's Objection to Exhibit 2038, Patent Owner enters **Exhibit 2045** which contains the full table of contents for Exhibit 2038.

Petitioner also objects to Exhibits 2021, 2025, 2031, 2035, 2037, and 2038 as unauthenticated and/or hearsay. Dr. Ricketts, however, will be offered for a deposition and can provide testimony with regards to these Exhibits.

IPR2024-00934
Patent No. 7,496,342

Dated: April 30, 2025

Respectfully submitted,

By: /Jason S. Charkow/

Jason S. Charkow (USPTO Reg. No. 46,418)*

Richard Juang (USPTO Reg. No. 71,478)*

Chandran B. Iyer (USPTO Reg. No. 48,434)

Ronald M Daignault*(admitted *pro hac vice*)*

Stephanie Mandir (USPTO Reg. No. 72,930)

jason.s.charkow@gmail.com

richard.juang@gmail.com

cbiyer@daignaultiyer.com

rdaignault@daignaultiyer.com

smandir@daignaultiyer.com

DAIGNAULT IYER LLP

8229 Boone Boulevard

Suite 450

Vienna, VA 22182

**Not admitted in Virginia*

Attorneys for ParkerVision, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PATENT OWNER'S SUPPLEMENTAL EVIDENCE IN RESPONSE TO PETITIONER'S OBJECTIONS TO EVIDENCE, together with all exhibits filed therewith, was served electronically via email on April 30, 2025, on the following counsel of record for Petitioners:

Joshua A. Griswold
Rishi Gupta
Yao Wang
Patrick J. Bisenius
Fish & Richardson P.C.
IPR12189-0090IP1@fr.com
PTABInbound@fr.com
griswold@fr.com
rgupta@fr.com
ywang@fr.com
bisenius@fr.com

Robert S. Magee
Blue Peak Law Group LLP
robert@bluepeak.law

Dated: April 30, 2025

Respectfully submitted,

By: /Jason S. Charkow/
Jason S. Charkow
USPTO Reg. No. 46,418