

Josh Griswold

From: Josh Griswold
Sent: Monday, March 17, 2025 3:17 PM
To: jcharkow@daignaultiier.com; Stephanie Mandir; kduche@daignaultiier.com; Taylor Lepore; IPR12189-0092IP1; PTAB Inbound; Rishi Gupta; Yao Wang; Rick Bisenius
Cc: PV
Subject: RE: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Jason,

We're setting up a Sharepoint site where you can download the additional materials from Dr. Galton. I believe you should be receiving login details shortly. We sent it to you, Stephanie, Konah, and Taylor, so anyone who wants can access the data.

Best,
Josh

From: Josh Griswold <griswold@fr.com>
Sent: Tuesday, March 11, 2025 10:43 AM
To: jcharkow@daignaultiier.com; Stephanie Mandir <smandir@daignaultiier.com>; kduche@daignaultiier.com; Taylor Lepore <tlepore@daignaultiier.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@daignaultiier.com>
Subject: RE: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Yes, we will get you to the materials by the 17th, so you can schedule based on that.

Typically the party taking a depo in the PTAB is taking cross, and the party presenting the witness then takes redirect. We think that's appropriate here. We just wanted to confirm.

Best,
Josh

From: Jason Charkow <jcharkow@daignaultiier.com>
Sent: Tuesday, March 11, 2025 8:46 AM
To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@daignaultiier.com>; kduche@daignaultiier.com; Taylor Lepore <tlepore@daignaultiier.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>
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The deposition of Galton will be focused on the new materials that are being provided. We will use whatever time we have left of 7 hours from first dep if we need that time. My understanding is that we used less than 3 hours on the record.

Not sure I understand - will it be treated as cross - please explain.

Given that we need 1 month extension to file the POR, we are going to need to ask Board to move dates.

Do you think you can definitely provide materials on March 17? We don't want to propose a schedule if we are only going to have to rework it again because TI cannot meet that date.



Jason S. Charkow

Partner

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From: Josh Griswold <griswold@fr.com>
Sent: Friday, March 7, 2025 1:00 PM
To: Stephanie Mandir <smandir@daignaultiyer.com>; Jason Charkow <jcharkow@daignaultiyer.com>; Konah Duche <kduche@daignaultiyer.com>; Taylor Lepore <tlepore@daignaultiyer.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@daignaultiyer.com>
Subject: RE: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Stephanie,

Please expand on your proposal for the deposition. Confirm you agree it would be limited to the updated materials we provide. How long do you propose, e.g., do you intend to use the remainder of your 7hrs? Would it be treated as cross?

Please also provide a table detailing your proposal for how all the dates in the schedule work out (including the motion to exclude briefing and whether we'll need to ask the Board to move any dates) if we're able to prove you the requested discovery by March 17th.

Best,
Josh

From: Stephanie Mandir <smandir@daignaultiyer.com>

Sent: Thursday, March 6, 2025 10:42 AM

To: Josh Griswold <griswold@fr.com>; jcharkow@daignaultiyer.com; kduche@daignaultiyer.com; Taylor Lepore <tlepore@daignaultiyer.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@daignaultiyer.com>

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

Counsel,

Following our conversation with the Board yesterday, and after conferring with our client, we have decided to move forward by requesting production of all of Dr. Galton's additional simulations now.

During his deposition, Dr. Galton stated that he re-ran simulations to correct the mistake of using a generic JFET model instead of the specific Siliconix U430 model disclosed in DeMaw. He also indicated that he ran other simulations with various modifications based on waveforms and values from the prior art references. Dr. Galton confirmed he is willing to share all of these new simulations with us now. Accordingly, we request the following:

1. Simulations run by Dr. Galton where he fixed the mistake of using the generic JFET model and implemented the specific Siliconix U430 model;
2. All other simulations run by Dr. Galton after reviewing the Patent Owner's Preliminary Response, including any variations or iterations;
3. All related Python code used to generate or analyze the simulations, including any model libraries, native LTSpice files, and additional generic or supporting files necessary to replicate the simulations; and
4. Any instructions or scripts used for running the simulations, including Python-based instructions.

Please confirm when you can produce these materials so that we have sufficient time to review them before re-deposing Dr. Galton in IPR2024-00934. We do not believe we will have enough time to prepare to depose Dr. Galton on these issues on March 12. We will need to discuss another date for Dr. Galton to be deposed on the new simulations.

We also believe a one-month extension of the Patent Owner's Response deadline from the date we receive the full production is appropriate. The Board confirmed during our call that they are willing to adjust the schedule on the backend to accommodate this.

Please confirm when you can produce these materials and your position on a corresponding extension of the POR deadline.

Best,
Stephanie



Stephanie R. Mandir
Counsel