
From: Josh Griswold

Sent: Monday, March 3, 2025 5:12 PM

To: Jason Charkow <jcharkow@daignaultiyer.com>; kduche@daignaultiyer.com; Stephanie Mandir <smandir@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

Jason,

Your email is inaccurate and we cannot agree to your sending it.

Our offer relates to one mistake Dr. Galton testified about on Friday, a typo that failed to invoke to the Siliconix U430 JFET. See, rough transcript at 39:19-40:18. As Dr. Galton testified Friday, he discovered the mistake “just a few days ago” (rough transcript 97:4) and subsequently confirmed that the typo “didn’t materially change the results”. Rough transcript at 39:19-40:18.

Your POPR did not identify this mistake, and we disagree that there are, as your email states, “mistakes” plural in the analysis.

We’re offering you the updated simulation output with this one change as a courtesy to show, as Dr. Galton testified, that the simulator’s use of a default JFET model, instead of the U430 JFET, “didn’t materially change the results” so you don’t waste words in your POPR on it. We are not asking the PTAB to let us file the updated output at this time. I’ve simply explained two manners by which you could make it of record if you wanted to. You could also choose to take the updated output and not make it part of the record.

If you do not want the updated output, that’s your prerogative. If you don’t take it now, you can fight its entry into the record if we decide to file it with our reply.

However, we do not agree to your sending the email below, because, at this point, there is nothing for the PTAB to resolve.

Best,
Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Monday, March 3, 2025 3:56 PM

To: Josh Griswold <griswold@fr.com>; kduche@daignaultiyer.com; Stephanie Mandir <smandir@daignaultiyer.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>
Subject: Re: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Below is the draft email to the Board. Please provide any insert that you may have so that we can get this out tonight.

Dear Honorable Board,

The parties require your guidance on an issue that arose on Friday 2/28. The parties request a call with the Board and are available at the following dates/times:

- Tuesday 3/4 - after 2 PM EST
- Wednesday 3/5 - after 2 PM EST
- Thursday 3/6 - 2-3 PM EST

On August 29, 2024, ParkerVision (Patent Owner) filed and served its POPR in which ParkerVision identified mistakes with circuit simulations prepared by Petitioner's expert, Dr. Galton, in his declaration accompanying the Petition. These simulations provide the basis for TI's invalidity positions and these mistakes go directly to the heart of the issue in this IPR.

On November 26, 2024, the Board instituted the IPR. The parties agreed to extend the date for the POR until March 3, 2025.

On Friday 2/28, ParkerVision took to the deposition of Dr. Galton. During that deposition, Dr. Galton stated he was aware of mistakes he made in his simulations shortly after the POPR was served. Yet, it was only 6 months later during the deposition that, for the first time, Dr. Galton/TI sought to provide corrected simulation documents. ParkerVision refused to accept these new documents because they were not part of the record and ParkerVision had no time to consider them in the middle of the deposition.

On Friday 2/28 night, TI offered to provide corrected simulations by Monday 3/3 as well as a 10-day extension for ParkerVision to file its POR and address these simulations and depose Dr. Galton on the new simulations.

Now, instead of having nine months to have its expert consider TI's simulations as it should have, ParkerVision and its expert are being asked to address the new simulations in its POR in 10 days. ParkerVision's expert (who had already prepared his own simulations based on what was in the Petition) is also busy during this time.

The late disclosure of these corrected simulations is highly prejudicial to ParkerVision, because ParkerVision and its expert do not have ample time to consider the new schematics and prepare a response (including simulations to counter TI's new simulations). There is also no more time left in the schedule to give ParkerVision the months that it is entitled to review the simulations under the IPR rules.

ParkerVision does not believe that these new simulations should be allowed as ParkerVision's expert will not be given the opportunity to consider and provide a declaration addressing these simulations, and potentially running additional simulations of his own, in the time that should be allowed under IPR statute and precedent.



Jason S. Charkow

Partner

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daignaultiyer.com

From: Josh Griswold <griswold@fr.com>
Sent: Monday, March 3, 2025 2:51 PM
To: Konah Duche <kduche@daignaultiyer.com>; Jason Charkow <jcharkow@daignaultiyer.com>; Stephanie Mandir <smandir@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

Please file.

From: Konah Duche <kduche@daignaultiyer.com>
Sent: Monday, March 3, 2025 1:49 PM
To: Josh Griswold <griswold@fr.com>; jcharkow@daignaultiyer.com; Stephanie Mandir <smandir@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,

Attached please find the Joint Stipulation for your review. Please let us know whether we can proceed with getting this filed. Thank you.

Regards,
Konah

From: Josh Griswold <griswold@fr.com>
Sent: Monday, March 3, 2025 1:30 PM
To: Jason Charkow <jcharkow@daignaultiyer.com>; Stephanie Mandir <smandir@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

Jason,

We agree to extend the due date 2-3 days. We're available Tuesday 2ET onward, Wednesday 2ET onward, Thursday 2-3 and 4-5 ET, and Friday 3 ET onward.

Please communicate to the PTAB that we'd offered to let you hold a short '342 depo specifically on the update at Dr. Galton's upcoming depo in the related cases and we'd make the update of record as an exhibit at that depo, or, if you don't want to question him about it, PO would simply file it with their response, noting it as a document provided by petitioner.

Best,
Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Monday, March 3, 2025 11:15 AM
To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

I would like to understand the Board's view on this situation before we do anything.

Can you please give me a few dates/times that you are free early this week so we can talk to the Board?

Can you also confirm that TI agrees to extend the due date 2-3 days as we try to work this out with the Board?



Jason S. Charkow

Partner

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From: Josh Griswold <griswold@fr.com>
Sent: Monday, March 3, 2025 12:10 PM
To: Jason Charkow <jcharkow@daignaultiyer.com>; Stephanie Mandir <smandir@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

Jason,

Getting it into the record is not a problem. We can make it a depo exhibit if you'd like to conduct a short '342 depo on it on the 12th. Or, if you don't want to dispose him on it, you can just file it as an exhibit to your POR and note in your POR that it was a document petitioner provided.

We'll talk to Dr. Galton to see when he can provide the updates.

Best,
Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Sunday, March 2, 2025 11:39 PM
To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

Josh

We are re-considering your proposal. But we want to seek the Board's guidance before we do so.

Will TI agree to an extension of time to file the POR until we can get on the phone with the Board and get their view on the situation?

We would like to email the Board tomorrow (Monday) AM.

By tomorrow AM, please provide dates/times when TI is available for a call with the Board on Tuesday and Wednesday. We will provide those dates/times to the Board assuming we are free then.

Thanks

Jason



Jason S. Charkow

Partner

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From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Friday, February 28, 2025 5:23 PM

To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

We can only depose him on what is in the actual record.

From: Josh Griswold <griswold@fr.com>

Sent: Friday, February 28, 2025 5:19:13 PM

To: Jason Charkow <jcharkow@daignaultiyer.com>; Stephanie Mandir <smandir@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

Understood. We note that you will not accept the updated simulation output, extension till past our upcoming depo in the companion IPRs, and opportunity to depose him on the updated simulation output.

Have a good weekend.

Best,
Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Friday, February 28, 2025 4:10 PM
To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

we will not accept that new material. It is new evidence. We will not be addressing it in our por. We will only be addressing what was in the actual petition.

From: Josh Griswold <griswold@fr.com>
Sent: Friday, February 28, 2025 4:35:31 PM
To: Jason Charkow <jcharkow@daignaultiyer.com>; Stephanie Mandir <smandir@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>
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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

From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Friday, February 14, 2025 2:51 PM

To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

video



Jason S. Charkow

Partner

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From: Josh Griswold <griswold@fr.com>
Sent: Friday, February 14, 2025 3:40 PM
To: Stephanie Mandir <smandir@daignaultiyer.com>; Jason Charkow <jcharkow@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

Also, I'm assuming you want to take the depositions by videoconference but let me know if you'd like to take them in person.

Best,
Josh

From: Josh Griswold
Sent: Friday, February 14, 2025 2:38 PM
To: 'Stephanie Mandir' <smandir@daignaultiyer.com>; jcharkow@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,

2/28 and 3/12 are both open for Dr. Galton. He's on the West coast. Can we start both depo days at noon ET to accommodate the time difference?

Best,
Josh

From: Stephanie Mandir <smandir@daignaultiyer.com>

Sent: Thursday, February 13, 2025 5:15 PM

To: Josh Griswold <griswold@fr.com>; jcharkow@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

The 12th works for us. Thanks



Stephanie R. Mandir
Associate

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202.270.5666
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From: Josh Griswold <griswold@fr.com>

Sent: Thursday, February 13, 2025 5:34 PM

To: Stephanie Mandir <smandir@daignaultiyer.com>; Jason Charkow <jcharkow@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,

I know that Dr. Galton lectures on Thursdays, so the 13th won't work. I don't know if the 14th or 12th would work for him, but would either work for you?

Best,
Josh

From: Stephanie Mandir <smandir@daignaultiyer.com>

Sent: Thursday, February 13, 2025 3:54 PM

To: jcharkow@daignaultiyer.com; Josh Griswold <griswold@fr.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

Josh,

The deposition on February 28th will cover U.S. Patent No. 7,496,342.

As Dr. Galton has submitted three separate declarations, we are entitled to take his deposition three times. However, we are willing to consolidate his depositions for IPR2024-00935 (U.S. Patent No. 7,865,177) and IPR2024-00936 (U.S. Patent No. 9,118,528) into a single day. Please let us know whether Dr. Galton is available on March 13th for that deposition.

Thanks,
Stephanie



Stephanie R. Mandir
Associate

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From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Thursday, February 13, 2025 11:09 AM

To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

I will check.



Jason S. Charkow

Partner

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From: Josh Griswold <griswold@fr.com>

Sent: Thursday, February 13, 2025 10:54 AM

To: Jason Charkow <jcharkow@daignaultiyer.com>; Stephanie Mandir <smandir@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

Yes, you can do July 25th.

We'll check with Dr. Galton. What patents would that depo cover?

From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Thursday, February 13, 2025 8:45 AM

To: Josh Griswold <griswold@fr.com>; Stephanie Mandir <smandir@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

Could we do July 25? I understand that you want more time before the Aug 5 date, but having two responses due the same day is tough.

Is Dr. Galton free Feb 28 for a remote depo?

We will prepare a stip for the other 2 cases.



Jason S. Charkow

Partner

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From: Josh Griswold <griswold@fr.com>

Sent: Wednesday, February 12, 2025 12:24 PM

To: Stephanie Mandir <smandir@daignaultiyer.com>; Jason Charkow <jcharkow@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,

I spoke with TI last night. We can agree with your proposal if you move your surreply deadline on the -00936 proceeding to July 21st, thus giving us one more week for the Motion to Exclude.

Do you have any feel for when you want to depose Dr. Galton? If so, we'll talk to him about his availability.

Best,

Josh

From: Stephanie Mandir <smandir@daignaultiyer.com>

Sent: Tuesday, February 11, 2025 11:38 AM

To: Josh Griswold <griswold@fr.com>; jcharkow@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

Josh,

Below are our proposed modifications to the Scheduling Orders for IPR2024-00934, IPR2024-00935 and IPR2024-00936.

If you are able to sign off on the schedules for IPR2024-00934 and IPR2024-00935, please let us know as soon as possible so we can proceed with filing a notice with the PTAB.

Regarding IPR2024-00936, we understand there may be some concern regarding DUE DATES 3 and 5. We believe that 8 days is sufficient for the motion to exclude briefing, but if your client disagrees, we are available for a call to discuss potential alternatives.

Thanks,

Stephanie

IPR2024-00934 DUE DATES	Current Date	Proposed Date
DUE DATE 1	Tuesday, February 18, 2025	Monday, March 3, 2025
DUE DATE 2	Tuesday, May 13, 2025	Monday, May 26, 2025
DUE DATE 3	Tuesday, June 24, 2025	Monday, July 7, 2025
DUE DATE 4	Tuesday, July 15, 2025	SAME
DUE DATE 5	Tuesday, August 5, 2025	SAME
DUE DATE 6	Tuesday, August 12, 2025	SAME
DUE DATE 7	Tuesday, August 19, 2025	SAME
DUE DATE 8	Tuesday, September 9, 2025	SAME

IPR2024-00935 DUE DATES	Current Date	Proposed Date
DUE DATE 1	Tuesday, February 18, 2025	Monday, March 17, 2025
DUE DATE 2	Tuesday, May 13, 2025	Monday, June 9, 2025
DUE DATE 3	Tuesday, June 24, 2025	Monday, July 21, 2025
DUE DATE 4	Tuesday, July 15, 2025	SAME
DUE DATE 5	Tuesday, August 5, 2025	SAME
DUE DATE 6	Tuesday, August 12, 2025	SAME
DUE DATE 7	Tuesday, August 19, 2025	SAME
DUE DATE 8	Wednesday, September 10, 2025	SAME

IPR2024-00936 DUE DATES	Current Date	Proposed Date
DUE DATE 1	Tuesday, February 18, 2025	Monday, March 24, 2025
DUE DATE 2	Tuesday, May 13, 2025	Monday, June 16, 2025
DUE DATE 3	Tuesday, June 24, 2025	Monday, July 28, 2025
DUE DATE 4	Tuesday, July 15, 2025	SAME
DUE DATE 5	Tuesday, August 5, 2025	SAME
DUE DATE 6	Tuesday, August 12, 2025	SAME
DUE DATE 7	Tuesday, August 19, 2025	SAME
DUE DATE 8	Wednesday, September 10, 2025	SAME



Stephanie R. Mandir

Associate

Daignault Iyer LLP
202.270.5666
smandir@daignaultiyer.com
daignaultiyer.com

From: Josh Griswold <griswold@fr.com>

Sent: Tuesday, February 11, 2025 10:37 AM

To: Jason Charkow <jcharkow@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

Jason, you were going to give me a full proposal. Is that in my inbox and I've missed it? We need to see all the deadlines, and especially how you propose handling the MTE briefing, given that the last MTE deadline is immovable (per the PTAB's SO) and all of your proposals crash into that date.

From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Thursday, February 6, 2025 4:21 PM

To: Josh Griswold <griswold@fr.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

Can you please bring the proposal I made to your client? I think we can fit everything in with the extensions. I already came back with a week less. We are asking for one additional week more than you wanted. I don't think the week will make a difference to TI or the schedule.

Thanks

Jason



Jason S. Charkow

Partner

Daignault Iyer LLP

914.843.8138

jcharkow@daignaultiyer.com

daignaultiyer.com

From: Josh Griswold <griswold@fr.com>

Sent: Thursday, February 6, 2025 5:02 PM

To: Jason Charkow <jcharkow@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

Jason, you did not respond to my comment - If you set the 00936 surreply due the same day as the '00935, we can bring that proposal to TI for their consideration.

From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Thursday, February 6, 2025 12:36 PM

To: Josh Griswold <griswold@fr.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

See below in-lines in blue. Let me know. Thanks



Jason S. Charkow

Partner

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914.843.8138

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From: Josh Griswold <griswold@fr.com>

Sent: Thursday, February 6, 2025 9:58 AM

To: Jason Charkow <jcharkow@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

Jason, are you proposing: [yes](#)

IPR2024-00934 - March 3, 2025

IPR2024-00935 - March 17, 2025

IPR2024-00936 - March 24, 2025

and moving the reply and surreply deadlines back a corresponding number of days? [yes](#) What about the Mot to Excludes? [I don't think we need that much time for these](#). Also, the last surreply deadline still concerns us. If you set the 00936 surreply due the same day as the '00935, we can bring that proposal to TI for their consideration.

Please send us a full proposal.

Best,

Josh

From: Jason Charkow <jcharkow@daignaultiier.com>

Sent: Thursday, February 6, 2025 8:35 AM

To: Josh Griswold <griswold@fr.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

What about March 24?



Jason S. Charkow

Partner

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From: Josh Griswold <griswold@fr.com>

Sent: Thursday, February 6, 2025 9:32 AM

To: Jason Charkow <jcharkow@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

Nonetheless, Jason, the oral argument date is set in stone and that's the date that your proposal runs afoul of. Your finishing the last POR by 3/31 pushes the rest of the schedule into the time for Mot to Exclude briefing and pre-oral argument activities. It would require us to compress the Mot to Exclude briefing, compresses the pre-oral argument activities, gives TI less time to consider your surreply and it consumes all of the flexibility built into the schedule should TI (or really either party) need an extension. An extension to 3/31 is just unreasonable.

Also, the POR deadline isn't keyed to the filing date accorded notice. It's set based on institution and was set only about week earlier than the typical 3mo. It wasn't really that early.

As noted below, we're willing to give you nearly an entire month. That's still quite an extension, considering you've known of the deadlines since November.

Best,

Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Wednesday, February 5, 2025 7:55 PM
To: Josh Griswold <griswold@fr.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

We really do need the extra time. The board set the date for response early if you look at the filing date accorded to this case. Thus I think the schedule allows for an extension for us and ti.

From: Josh Griswold <griswold@fr.com>
Sent: Wednesday, February 5, 2025 1:32:42 PM
To: Jason Charkow <jcharkow@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

Jason,

The March 31st date is still quite an extension (only 2 weeks less than your original proposal), and consumes the flexibility built into the schedule should TI need an extension. Would you be able to get all three done by March 17th? That's an entire month of extension.

Best,

Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Wednesday, February 5, 2025 12:15 PM
To: Josh Griswold <griswold@fr.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

Following up again.

We need to file a motion.



Jason S. Charkow

Partner

Daignault Iyer LLP
914.843.8138
jcharkow@daignaultiyer.com
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From: Jason Charkow <jcharkow@daignaultiyer.com>
Sent: Monday, February 3, 2025 12:54 PM

To: Josh Griswold <griswold@fr.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

I need to move the first due date to March 3 and at least 2 weeks in between due dates

IPR2024-00934 - March 3, 2025

IPR2024-00935 - March 17, 2025

IPR2024-00936 - March 31, 2025



Jason S. Charkow

Partner

Daignault Iyer LLP
914.843.8138
jcharkow@daignaultiyer.com
daignaultiyer.com

From: Josh Griswold <griswold@fr.com>
Sent: Friday, January 31, 2025 5:42 PM
To: Jason Charkow <jcharkow@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

Jason,

What do you need to accommodate your scheduling constraints?

Best,

Josh

From: Jason Charkow <jcharkow@daignaultiery.com>

Sent: Friday, January 31, 2025 4:04 PM

To: Josh Griswold <griswold@fr.com>; Taylor Lepore <tlepore@daignaultiery.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@daignaultiery.com>

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

Can we have a quick call on Monday to discuss so that I can figure out the bounds of what you would consider? I want to propose something that will actually work for you and work in our schedule. Thanks.

From: Josh Griswold <griswold@fr.com>

Sent: Friday, January 31, 2025 4:58:17 PM

To: Jason Charkow <jcharkow@daignaultiery.com>; Taylor Lepore <tlepore@daignaultiery.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@daignaultiery.com>

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

Jason, this is your deadline and its your team's work schedule you need to work around. Propose something.

Best,

Josh

From: Jason Charkow <jcharkow@daignaultiyr.com>
Sent: Thursday, January 30, 2025 5:58 AM
To: Josh Griswold <griswold@fr.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>
Subject: Re: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Josh

Please tell us what you believe would be a reasonable compromise Extension that you will agree to?

Once I know what you are willing to consider we can talk otherwise I am just guessing what will work for you.

Thanks.

From: Josh Griswold <griswold@fr.com>
Sent: Wednesday, January 29, 2025 2:20:55 PM
To: Jason Charkow <jcharkow@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>
Subject: RE: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Jason,

We cannot agree to your proposed schedule change. The deadline for the PORs was set by the PTAB as Feb 18th. Not only do your requests substantially deviate from this date, they completely rewrite the schedules and consume the remaining flexibility in the schedule such that if we needed to shift a date, there wouldn't be room. Moreover, in the '936 proceeding, it pushes the surreply on top of the motion to exclude briefing.

We are reasonable, and willing work with you. But this is too big of an ask and has the potential to substantively prejudice TI. If you need flexibility to get the PORs done before your March trial, we're open to hearing your alternate proposals around that.

Best,

Josh

Joshua A. Griswold

Office Managing Principal ■ Fish & Richardson P.C.

T: 214 292 4034 | griswold@fr.com | [Bio](#)

From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Friday, January 17, 2025 10:29 AM

To: Josh Griswold <griswold@fr.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

Everything would get pushed the same amount of time.



Jason S. Charkow

Partner

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914.843.8138

jcharkow@daignaultiyer.com

daignaultiyer.com

From: Josh Griswold <griswold@fr.com>

Sent: Friday, January 17, 2025 11:25 AM

To: Jason Charkow <jcharkow@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

Jason,

Are you going to let us have your thoughts on how the remainder of the schedule plays out for each proceeding?

Best,

Josh

From: Jason Charkow <jcharkow@daignaultiyer.com>

Sent: Thursday, January 16, 2025 2:51 PM

To: Josh Griswold <griswold@fr.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

Right now, our team has a pretrial conference at the end of February (and is in the middle of briefings and pretrial exchanges) and trial-prep/trial in March. So we need the extra time to work around all of this and deal with the IPRs as well.

We also have other litigations where discovery is coming to a close.

Thanks

Jason



Jason S. Charkow

Partner

Daignault Iyer LLP

914.843.8138

jcharkow@daignaultiyer.com

daignaultiyer.com

From: Josh Griswold <griswold@fr.com>
Sent: Thursday, January 16, 2025 3:25 PM
To: 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>
Subject: RE: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

Taylor,

That is quite an extension on these PORs that you're requesting. That's almost a 2 month extension for the -00936. Can you explain your need?

Also, please outline your proposal for how the remainder of the schedule would play out for each proceeding.

Best,

josh

From: Taylor Lepore <tlepore@daignaultiyr.com>
Sent: Tuesday, January 14, 2025 11:53 AM
To: 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>
Subject: Texas Instruments Inc., and NXP USA, Inc. v. ParkerVision, Inc. - Extension Request for Patent Owner Responses

[This email originated outside of F&R.]

Counsel,

I am writing to request additional time to file the Patent Owner Responses for IPR2024-00934, IPR2024-00935, & IPR2024-00936 all of which are currently due on February 18, 2025.

We request that the February 18th deadline be extended until March 3rd for IPR2024-00934 and that the following responses be spaced out every three weeks. We specifically propose the timeline below for the submission of the responses:

- IPR2024-00934 - March 3, 2025
- IPR2024-00935 - March 24, 2025
- IPR2024-00936 - April 14, 2025

Please let us know if you agree with this proposed timeline so that we can file a request with the Board.

Regards,



Taylor Lepore

Associate

Daignault Iyer LLP
917-829-0235
tlepore@daignaultiyer.com

daignaultiyer.com

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