

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXAS INSTRUMENTS INCORPORATED,
Petitioner

v.

PARKERVISION, INC.,
Patent Owner

Case IPR2024-00936
Patent 9,118,528

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 4, 2025.

<u>Evidence</u>	<u>Objections</u>
2009	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2009 under FRE 802 because it 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 2009 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 2009 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2010	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2010 under FRE 802 because it 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 2010 as containing opinions and information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner also objects to the Exhibit 2010 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to Exhibit 2010 under FRE 106 and 1002 for incompleteness as to other written or typed pages that may have been part of the document. To the extent any exist, Exhibit 2010 lacks any additional pages that were part of the original document.
2011	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106 and 1002)

	Petitioner objects to the admissibility of Exhibit 2011 under FRE 802 because it is relied on for statements (including 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 2011 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 2011 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2011 under FRE 106 and 1002 for lack of completeness because the exhibit lacks metadata, and lacks an indication of whether other pages were part of the original document. To the extent any exist, Exhibit 2011 lacks any additional pages that were part of the original document.
2012	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2012 under FRE 802 because it is relied on for statements (including 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 2012 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 2012 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2012 under FRE 106 and 1002 for lack of completeness because the exhibit lacks metadata or other sources of underlying circuit architecture, and lacks an indication of whether other pages were part of the original document. To the extent any exist, Exhibit 2012 lacks any additional pages that were part of the original document. Petitioner objects to the admissibility of

	Exhibit 2012 under FRE 106 and 1002 for lack of completeness because it does not include metadata or data sources for schematics that it relies on, including the schematic is drawn from the GDSII file of the chip and underlying files.
2013	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2013 under FRE 802 because it is relied on for statements (including 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 2013 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 2013 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2013 under FRE 106 and 1002 for lack of completeness because the exhibit lacks metadata, and lacks an indication of whether other pages were part of the original document. To the extent any exist, Exhibit 2013 lacks any additional pages that were part of the original document.
2014	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2014 under FRE 802 because it is relied on for statements (including 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 2014 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 2014 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Exhibit 2014 under FRE 106 and 1002 for

	lack of completeness because the exhibit lacks metadata, and lacks an indication of whether other pages were part of the original document. To the extent any exist, Exhibit 2014 lacks any additional pages that were part of the original document.
2015	Irrelevant, Misleading, Improper Testimony, Hearsay, Unauthenticated, Completeness (FRE 401-403, 702, 702, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2015 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 2015 under FRE 802 because is relied on for statements (including 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 2015 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 2015 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Petitioner objects to the admissibility of Exhibit 2015 under FRE 106 and 1002 for lack of completeness because it does not include metadata or data sources for schematics that it relies on, including the schematic is drawn from the GDSII file of the chip and underlying files.
2016	Irrelevant, Misleading, Improper Testimony, Hearsay, Completeness (FRE 401-403, 702, 703, 802, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2016 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 2016 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 2016 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Petitioner objects to the admissibility of Exhibit 2016 under FRE 106 and 1002 as lacking completeness because it relies on files, schematic, and other sources of data that are not made available or provided as exhibits, including the schematic is drawn from the GDSII file of the chip.
2019	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2019 under FRE 802 because is relied on for statements (including 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 2019 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 2019 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be, when it was made publicly available, or how it was made publicly accessible.
2020	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2020 under FRE 802 because is relied on for statements (including 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 2020 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 2020 under FRE 901 because there is insufficient evidence establishing what the exhibit

	purports to be, when it was made publicly available, or how it was made publicly accessible.
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.
2022	Irrelevant, Misleading, Improper Testimony, Hearsay, Completeness (FRE 401-403, 702, 703, 802, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2022 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 2022 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 2022 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Exhibit 2022 under FRE 106 and 1002 for lack of completeness because the exhibit lacks an indication of whether other pages were part of the original document. To the extent any exist, Exhibit 2022 lacks any additional pages that were part of the original document.

2024	Irrelevant, Misleading, Improper Testimony, Hearsay (FRE 401-403, 702, 703, 802) Petitioner objects to the admissibility of Exhibit 2024 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 2024 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 2024 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, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2025 under FRE 802 because is relied on for statements (including 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 is 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 106 and 1002 for lack of completeness because the exhibit lacks the book jacket, a full table of contents, and other indications of whether differential output is discussed in the reference.
2027	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2027 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 2027 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 2027 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be.
2029	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2029 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 2029 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 2029 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Exhibit 2029 under FRE 106 and 1002 for lack of completeness because the exhibit lacks metadata, and lacks an indication of whether other pages were part of the original document. To the extent any exist, Exhibit 2029 lacks any additional pages that were part of the original document.
2031	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2031 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 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 (FRE 401-403, 802, 901, 106 and 1002) Petitioner objects to the admissibility of Exhibit 2035 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 2035 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 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 106 and 1002 for lack of completeness because the exhibit lacks the book jacket, a full table of contents, all but the provided few pages of the book, and other indications of whether distinct regions of operation are discussed in the reference.
2037	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Petitioner objects to the admissibility of Exhibit 2037 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 2037 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 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 106 and 1002 for lack of completeness because the exhibit lacks the book jacket, a full table of contents, all but the provided few pages of the book, and other indications of whether distinct regions of operation are discussed in the reference.
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For at least these reasons, Petitioner objects to Exhibit(s) 2009-2016, 2019-2022, 2024-2025, 2027, 2029, 2031, 2032, 2035, and 2037.

Respectfully submitted,

Dated: April 10, 2025

/Joshua A. Griswold/

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§42.6(e), the undersigned certifies that on April 10, 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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