

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TEXAS INSTRUMENTS INC.
and NXP USA, INC.,
Petitioners,

v.

PARKERVISION, INC.,
Patent Owner.

IPR2024-00936¹
Patent 9,118,528 B2

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

¹ NXP USA, Inc., who filed a petition in IPR2024-01068, is joined as petitioner in this proceeding.

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	U.S. Patent No. 6,061,551
2007	Joint Claim Construction Statement, ParkerVision, Inc. v. Texas Instruments Inc., 6:23-cv-00384, Dkt. 50 (April 29, 2024)
2008	RESERVED
2009	UA741 datasheet
2010	Boeing Report dated April 29, 1998
2011	ParkerVision schematic dated January 20, 1998
2012	Eddie chip layout dated March 6, 1997
2013	ParkerVision circuit board layout
2014	ParkerVision schematic dated August 21, 1997
2015	Conception/Reduction to practice chart
2016	Declaration of David Sorrells
2017	RESERVED
2018	RESERVED
2019	ParkerVision Announces Breakthrough in Wireless Radio Frequency Technology
2020	Laboratory Tests Verify ParkerVision Wireless Technology
2021	Universal Direct Conversion Receiver Evaluation ASIC Contract between ParkerVision and The Boeing Company
2022	Notes from Boeing Tests

2023	RESERVED
2024	Declaration of Dr. David Ricketts
2025	Excerpts from Howe, R. et al., Microelectronics: An Integrated Approach
2026	RESERVED
2027	Development Agreement between ParkerVision and TriQuint Semiconductor dated March 4, 1997
2028	Default Protective Order
2029	Spreadsheet showing ParkerVision files
2030	Claim Construction Order dated 2/20/13 – No. 3:11-cv-00719 (MDFL)
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	RESERVED
2034	Deposition Transcript of Ian Galton, dated March 12, 2025
2035	Sedra, Microelectronic Circuits (4 th ed. 1998)
2036	ParkerVision's Disclosure of Additional Final Infringement Contentions, dated March 31, 2025.
2037	CMOS Analog Circuit Design
2038	Full table of contents for Howe, R. et al., Microelectronics: An Integrated Approach
2039	Full table of contents for Sedra, Microelectronic Circuits (4 th ed. 1998)
2040	Full table of contents for CMOS Analog Circuit Design

On April 10, 2025, Petitioner served Objections to Evidence. *See* Paper 23. 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 2038** which contains the full table of contents for Exhibit 2025.

In response to Petitioner's Objection to Exhibit 2035, Patent Owner enters **Exhibit 2039** which contains the full table of contents for Exhibit 2035.

In response to Petitioner's Objection to Exhibit 2037, Patent Owner enters **Exhibit 2040** which contains the full table of contents for Exhibit 2037.

Petitioner also objected to Exhibits 2010-2014, 2019, 2020-2022, 2027, and 2029 as unauthenticated and/or hearsay. But David Sorrells (who has held positions as ParkerVision's Senior Technical Strategist, Director of Engineering, and Chief Technology Officer (CTO)), provided a declaration (Ex. 2016) in which he authenticated the exhibits listed above and testified that these exhibits were business records (which is an exception to hearsay under Fed. R. Evid. Rule 803(6)(b)). Additionally, ParkerVision has offered Mr. Sorrells for a deposition.

Petitioner also objects to Exhibits 2009-2016, 2019-2022, 2024, 2025, 2031, 2032, 2035, and 2037 as unauthenticated and/or hearsay. Dr. Ricketts, however,

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will be offered for a deposition and can provide testimony with regards to these Exhibits.

Dated: April 23, 2025

Respectfully submitted,

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**Not admitted in Virginia*

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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 23, 2025, on the following counsel of record for Petitioners:

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