

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

**PATENT OWNER'S OBJECTIONS TO PETITIONERS' EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

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

Pursuant to 37 C.F.R. §42.64(b)(1), Patent Owner ParkerVision, Inc. hereby submits the following objections to evidence filed with Petitioners' Reply.

Evidence	Objection
1045	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1045 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1045 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1045 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. Patent Owner objects to Exhibit 1045 under FRE 106 and 1002 for incompleteness as to other written or typed pages that may have been part of the document. Exhibit 1045 only contains what appears to be the cover and table of content of a textbook; it does not include content referenced in the expert declarations. To the extent any exist, Exhibit 1045 lacks any additional pages that were part of the original document.
1046	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1046 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1046 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1046 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. Patent Owner objects to Exhibit 1046 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 1046 lacks any additional pages that were part of the original document.

Evidence	Objection
1047	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1047 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1047 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1047 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.
1048	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1048 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Exhibit 1048 is not substantively replied upon in Petitioner's Reply and supporting expert declarations. Patent Owner also objects to Exhibit 1048 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1048 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.
1049	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1049 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Exhibit 1049 is not substantively replied upon in Petitioner's Reply and supporting expert declarations. Patent Owner also objects to Exhibit 1049 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1049 under FRE 802 because it is relied on for statements that constitute inadmissible hearsay.

Evidence	Objection
	The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods.
1050	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1050 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1050 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1050 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. Patent Owner objects to Exhibit 1050 under FRE 106 and 1002 for incompleteness as to other written or typed pages that may have been part of the document. Exhibit 1050 only contains what appears to be the cover and table of content of a textbook; it does not include content and figure referenced in the expert declarations. To the extent any exist, Exhibit 1050 lacks any additional pages that were part of the original document.
1052	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1052 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1052 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1052 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.
1053	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901)

Evidence	Objection
	Patent Owner objects to the admissibility of Exhibit 1053 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1053 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1053 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.
1054	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1054 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1054 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1054 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.
1055	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1055 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1055 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1055 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. Patent Owner objects to Exhibit 1055 under

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	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 1055 lacks any additional pages that were part of the original document.
1056	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1056 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1056 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1056 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.
1057	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1057 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1057 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1057 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.
1058	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1058 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1058 under FRE 901 because there is insufficient evidence

Evidence	Objection
	establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1058 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.
1059	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1059 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Exhibit 1059 is not substantively replied upon in Petitioner's Reply and supporting expert declarations. Patent Owner also objects to Exhibit 1059 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1059 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.
1060	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1060 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1060 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1060 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.
1061	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1061 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403.

Evidence	Objection
	Exhibit 1061 is not substantively replied upon in Petitioner's Reply and supporting expert declarations. Patent Owner also objects to Exhibit 1061 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1061 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.
1062	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1062 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1062 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1062 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. Patent Owner objects to Exhibit 1062 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 1062 lacks any additional pages that were part of the original document.
1063	Irrelevant, Misleading, Hearsay, Unauthenticated, Completeness (FRE 401-403, 802, 901, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1063 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Exhibit 1063 is not substantively replied upon in Petitioner's Reply and supporting expert declarations. Patent Owner also objects to Exhibit 1063 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1031 under FRE 802 because it is relied on for statements that constitute inadmissible hearsay.

Evidence	Objection
	The statements are offered for the truth of the matter asserted, and the statements are not the product of reliable principles or methods. Patent Owner objects to Exhibit 1063 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 1063 lacks any additional pages that were part of the original document.
1064	Irrelevant, Misleading, Hearsay, Unauthenticated (FRE 401-403, 802, 901) Patent Owner objects to the admissibility of Exhibit 1064 as containing information that is irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner also objects to Exhibit 1064 under FRE 901 because there is insufficient evidence establishing what the exhibit purports to be. Patent Owner further objects to the admissibility of Exhibit 1064 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.
1066	Irrelevant, Misleading, Improper Testimony, Hearsay, Completeness (FRE 401-403, 702, 703, 802, 106, 1002) Patent Owner objects to the admissibility of Exhibit 1066 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. Patent Owner objects to the admissibility of Exhibit 1066 under FRE 702-703 and 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 1066 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403. Patent Owner objects to the admissibility of Exhibit 1066 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.

Evidence	Objection
1067	Irrelevant, Misleading, Improper Testimony, Hearsay (FRE 401-403, 702, 703, 802) Patent Owner objects to the admissibility of Exhibit 1067 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. Patent Owner objects to the admissibility of Exhibit 1067 under FRE 702-703 and 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 1067 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403.
1069	Irrelevant, Misleading, Improper Testimony, Hearsay (FRE 401-403, 702, 703, 802) Patent Owner objects to the admissibility of Exhibit 1069 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. Patent Owner objects to the admissibility of Exhibit 1069 under FRE 702-703 and 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 1069 as containing opinions that are irrelevant, confusing, and presenting the danger of unfair prejudice under FRE 401, 402, and 403.

For at least these reasons, Patent Owner objects to Exhibits 1045-50, 1052-64, 1066-67, 1069.

Dated: July 7, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Patent Owner's
Objections to Evidence was served electronically via email on July 7, 2025, on the
following counsel of record for Petitioners:

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