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.

IPR2024-00936[1]
Patent 9,118,528 B2

PATENT OWNER'S MOTION TO SEAL

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

Patent Owner ParkerVision, Inc. ("Patent Owner" or "ParkerVision") hereby moves to seal its Sur-Reply and Exhibit Nos. 2043 and 2044 pursuant to 37 C.F.R.§ 42.54 and subject to the proposed Protective Order submitted by Patent Owner as Exhibit A to Paper No. 20 (Patent Owner's Motion for Entry of Default Protective Order and Motion to Seal)

Good cause exists to seal the unredacted version of Patent Owner's Sur-Reply and Exhibits 2043 and 2044 because they contain ParkerVision's confidential information.

Accordingly, Patent Owner respectfully requests that the Board maintain under seal and protect Patent Owner's confidential information in the unredacted versions of its Sur-Reply and Exhibit Nos. 2043 and 2044.

Dated: July 25, 2025

Respectfully submitted,

By: /*Jason S. Charkow*/

Jason S. Charkow (USPTO Reg. No. 46,418)*
Richard Juang (USPTO Reg. No. 71,478)*
Chandran B. Iyer (USPTO Reg. No. 48,434)
Stephanie Mandir (USPTO Reg. No. 72,930)
Ronald M Daignault*
jason.s.charkow@gmail.com
richard.juang@gmail.com
cbiyer@daignaultiyer.com
rdaignault@daignaultiyer.com
DAIGNAULT IYER LLP
8229 Boone Boulevard
Suite 450
Vienna, VA 22182
**Not admitted in Virginia*

Attorneys for ParkerVision, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PATENT OWNER'S MOTION TO SEAL was served electronically via email on July 25, 2025, on the following counsel of record for Petitioners:

Joshua A. Griswold
Rishi Gupta
Yao Wang
Patrick J. Bisenius
Fish & Richardson P.C.
IPR12189-0092IP1@fr.com
PTABInbound@fr.com
griswold@fr.com
rgupta@fr.com
ywang@fr.com
bisenius@fr.com

Robert S. Magee
Blue Peak Law Group LLP
robert@bluepeak.law

John J. Patti
Patti Pershern, PLLC
john@mppfirm.com

Christopher Crumbley
Michael Chibib
Christopher Mierzejewski
Bracewell LLP
kit.crumbley@bracewell.com
michael.chibib@bracewell.com
christopher.mierzejewski@bracewell.com
anna.hearn-darst@bracewell.com

Dated: July 25, 2025

Respectfully Submitted,

By: / *Jason S. Charkow* /
Jason S. Charkow
USPTO Reg. No. 46,418