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

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

PETITIONER'S UNOPPOSED MOTION TO SEAL

---

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

Pursuant to 37 C.F.R. § 42.14, this Motion moves to seal the following documents submitted in this proceeding: Exhibit 1070 - Petitioner's Demonstratives.

Patent Owner has previously filed a Motion to Seal moving for entry of the Board's Default Protective Order and to seal the Patent Owner's Response to Petition and certain exhibits filed therewith. Papers 18 and 20. Petitioner did not oppose Patent Owner's motion, and Petitioner continues to take no position about whether the material submitted by Patent Owner warrants sealing and entry of a protective order. Nonetheless, because the above identified accompanying exhibit describes and refers to material that Patent Owner moved to seal, Petitioner respectfully submits this Motion to Seal the above-identified accompanying exhibit, which is concurrently filed with this Motion.

I. DOCUMENTS REQUESTED TO BE SEALED

Petitioner's Exhibit 1070 discusses the material that Patent Owner sought to be sealed and subject to the Default Protective Order in Motion to Seal filed by Patent Owner. Papers 18 and 20 (seeking to seal Patent Owner's Response and Exhibits 2010-2016, 2021-2022, 2024 and 2029).

II. GOOD CAUSE EXISTS TO SEAL

There is good cause to seal Exhibit 1070 because it refers to and describes material that Patent Owner represented as being its confidential business information in its prior Motion to Seal. Patent Owner's arguments in support of its Motion to Seal apply equally to Petitioner's Demonstrative Exhibits, namely, Exhibit 1070.

III. CERTIFICATION OF NON-PUBLICATION

Patent Owner certified that the information it sought to seal by its previous Motion had not been made publicly available, and Petitioner has no further knowledge of the information at issue being made publicly available.

IV. PROPOSED PROTECTIVE ORDER

Patent Owner previously requested entry of the Default Protective Order. To the extent the Board grants Patent Owner's prior Motion to Seal, Petitioner submits that the material identified in this Motion to Seal should be subject to the same Default Protective order and identified as "PROTECTIVE ORDER MATERIAL."

V. CONCLUSION

For these reasons, Petitioner request sealing Exhibit 1070.

Respectfully submitted,

Date: September 3, 2025

/Yao Wang/

Joshua A. Griswold, Reg. No. 46,310
Rishi Gupta, Reg. No. 64,768
Yao Wang, Reg. No. 61,757
W. Karl Renner, Reg. No. 41,265
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
T: 202-783-5070
F: 877-769-7945

Attorneys for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e), the undersigned certifies that on September 3, 2025, a complete and entire copy of the Petitioner's Unopposed Motion to Seal was provided by email to the Patent Owner by serving the correspondence addresses of record as follows:

Jason S. Charkow
Richard Juang
Chandran B. Iyer
Ronald M. Daignault
Stephanie Mandir
DAIGNAULT IYER LLP
8229 Boone Boulevard, Suite 450
Vienna, VA 22182

Email: pvlit@daignaultiyer.com

/Diana Bradley/
Diana Bradley
Fish & Richardson P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
bradley@fr.com