

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,

Plaintiff,

v.

TEXAS INSTRUMENTS
INCORPORATED,

Defendant.

Case No. 6:23-cv-00384-ADA

JURY TRIAL DEMANDED

PARKERVISION, INC.’S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Parties’ Agreed Scheduling Order (D.I. 39), Plaintiff ParkerVision, Inc. (“ParkerVision”) hereby identifies the following constructions for the terms proposed for claim construction that were exchanged by the parties on January 31, 2024. ParkerVision reserves the right to supplement, modify, or withdraw its proposed claim constructions.

Proposed Claim Term and Asserted Claim(s)	Proposed for Construction By	ParkerVision’s Proposed Construction
“switching device” / “switch” (’342 patent, claims 18, 19, 20, 21; ’528 patent, claims 1, 5, 8, 17, 18, 19, 23, 26, 35, 36)	ParkerVision	Plain-and-ordinary meaning wherein the plain-and-ordinary meaning is “an electronic device for opening and closing a circuit as dictated by an independent control input”
“matched filtering/correlating module” (’177 patent, claim 14)	ParkerVision	“linear time-variant circuitry that samples a modulated RF (radio frequency) carrier signal at an aliasing rate using a switch with an independent control input driven by a control signal with a non-negligible, periodic aperture, such that the samples, having non-negligible available energy, are accumulated

		and transferred to a load while the switch is closed and discharged through the load while the switch is open, thereby transferring available real power from the modulated RF carrier signal to the load and producing a downconverted signal with enhanced signal-to-noise power ratio”
“A system for frequency down-converting a modulated carrier signal to a baseband signal” (’528 patent, claim 1)	ParkerVision	The preamble is limiting. Plain-and-ordinary meaning.
“modulated carrier signal” (’528 patent, claims 1-5, 19-23)	ParkerVision	Plain-and-ordinary meaning wherein the plain-and-ordinary meaning is “an electromagnetic signal at a transmission frequency having at least one characteristic that has been modulated by a baseband signal”
“sampling aperture” (’528 patent, claims 1, 18, 19, 36)	ParkerVision	“a period of time during which the switch is in its closed (i.e., on) state”
“energy storage element” (’528 patent, claims 1, 8, 9, 18, 19, 26, 27, 36)	ParkerVision	“an element of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal”
“the energy discharged during any given discharge cycle is not completely discharged” (’528 patent, claims 9, 27)	ParkerVision	Plain-and-ordinary meaning wherein the plain-and-ordinary meaning is “the energy that could potentially be discharged during any given discharge cycle is not completely discharged”
“controlling a charging and discharging cycle” (’342 patent, claim 18)	TI	Plain-and-ordinary meaning
“generate” (’342 patent, claim 18)	TI	Plain-and-ordinary meaning
“first channel down-converted signal” (’177 patent, claim 14)	TI	Plain-and-ordinary meaning
“outputs”	TI	Plain-and-ordinary meaning

('528 patent, claims 1, 19)		
“stores”	TI	Plain-and-ordinary meaning
('528 patent, claims 1, 19)		
“a second differential amplifier circuit that combines said down-converted quadrature-phase baseband signal portion with said down-converted differential quadrature-phase baseband signal portion and outputs a second channel down-converted differential quadrature-phase baseband signal”	TI	Plain-and-ordinary meaning
('528 patent, claim 19)		

Dated: February 14, 2024

/s/ Stephanie R. Mandir

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**Not admitted in Virginia*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served on February 14, 2024 via electronic mail to counsel of record for Defendant.

Dated: February 14, 2024

/s/ Stephanie Mandir
Stephanie Mandir