

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

PARKERVISION, INC.,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 6:20-cv-00108

JURY TRIAL DEMANDED

**PARKERVISION, INC.’S IDENTIFICATION OF PROPOSED CLAIM TERMS FOR
CONSTRUCTION**

Pursuant to this Court’s Scheduling Order (Dkt. No. 34), Plaintiff ParkerVision, Inc. (“ParkerVision”) hereby identifies its proposed claim terms for construction. This identification addresses the asserted claims of U.S. Patent Nos. 6,266,518 (the “’518 patent”); 6,580,902 (the “’902 patent”); 7,110,444 (the “’444 patent”); 7,539,474 (the “’474 patent”); 8,588,725 (the “’725 patent”); 8,660,513 (the “’513 patent”); 9,118,528 (the “’528 patent”); 9,246,736 (the “’736 patent”); and 9,444,673 (the “’673 patent”) (collectively, the “patents-in-suit”) as set forth in ParkerVision’s Preliminary Infringement Contentions and identified below:

- Claims 50 and 67 of the ’518 patent.
- Claims 1, 2, 4, and 5 of the ’902 patent.
- Claims 2-4 of the ’444 patent.
- Claims 1, 6, 10, and 11 of the ’474 patent.
- Claims 1, 6, 7, 13, 14, and 16-19 of the ’725 patent.
- Claims 19, 24, 27, and 28 of the ’513 patent.

- Claims 1, 5, 9, 14, 15, and 17 of the '528 patent.
- Claims 1, 11, 15, 19, 21, 26, and 27 of the '736 patent.

This identification does not address any claims other than those identified above. To the extent ParkerVision later amends its infringement contentions to add any claims, ParkerVision reserves the right to serve a supplemental identification of claim terms for construction to address any such additional claims. Further, ParkerVision makes these disclosures based on information currently available to ParkerVision including, but not limited to, its current and preliminary understanding of the patents-in-suit, and Defendants' Preliminary Invalidity Contentions. ParkerVision has not completed its investigation of the facts relating to this case. Accordingly, ParkerVision reserves the right to supplement its list of proposed terms for construction, including in response to Defendants' identification of proposed claim terms for construction. Subject to the forgoing, ParkerVision identifies the following claim terms for construction:

Claim Term No.	Claim Term	Patent(s); Claim Nos.
1	"frequency down-conversion module"	'444 patent; claims 2 and 3 '474 patent; claim 1
2	"subtractor module"	'444 patent; claims 2 and 3
3	"combining module"	'474 patent; claims 1, 10
4	"energy storage element"	'528 patent; claim 1
5	"integrated"	'528 patent; claims 1, 17
6	"modulated carrier signal"	'528 patent; claims 1, 5, 14
7	"sampling aperture"	'528 patent; claim 1
8	"switch"	'528 patent; claim 1, 5, 17

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