

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,
Plaintiff,

vs.

INTEL CORPORATION,
Defendant.

Civil Action No. 6:20-cv-00108-ADA

JURY TRIAL DEMANDED

DEFENDANT INTEL CORPORATION'S PROPOSED CLAIM TERMS

Pursuant to the August 7, 2020 Scheduling Order entered in this case, D.I. 34 at 2, Defendant Intel Corporation ("Intel") hereby submits its proposed claim terms for construction to Plaintiff ParkerVision, Inc. ("ParkerVision").

Intel proposes the following terms for construction from the following asserted patents: U.S. Patent Nos. 6,266,518 ("518 patent"); 6,580,902 ("902 patent"); 7,110,444 ("444 patent"); 7,539,474 ("474 patent"); 8,588,725 ("725 patent"); 8,660,513 ("513 patent"); 9,118,528 ("528 patent"); 9,246,736 ("736 patent") and 9,444,673 ("673 patent") (collectively, the "Asserted Patents"). Intel reserves the right, consistent with the Federal Rules of Civil Procedure and the Local Rules of this Court, as well as any other applicable rule, to revise its list of proposed claim terms in view of ParkerVision's forthcoming proposed claim terms, including the right to adopt any claim terms proposed by ParkerVision, and the right to add additional terms if, in view of ParkerVision's infringement allegations, the parties have further disputes regarding claim scope. *See O2 Micro Int'l Ltd. v. Beyond Innovation Tech. Co.*, 521 F.3d 1351, 1360 (Fed. Cir. 2008).

Intel v. ParkerVision

Intel's Proposed Terms	Asserted Claim(s)
"coupled to a [] reference potential"	'474 patent, claim 1
"under-samples"	'444 patent, claim 2 '474 patent, claim 6
<p><u>Down-Converter Terms:</u></p> <p>"frequency down-conversion module"</p> <p>"universal frequency down-converter"</p> <p>"energy transfer module"</p> <p>"aliasing module"</p> <p>"system for frequency down-converting"</p> <p>"apparatus for down-converting"</p>	<p><u>Down-Converter Terms:</u></p> <p>"frequency down-conversion module"</p> <ul style="list-style-type: none"> • '444 patent, claims 2 and 3 • '474 patent, claim 1 • '673 patent, claim 1 <p>"universal frequency down-converter"</p> <ul style="list-style-type: none"> • '518 patent, claim 50 <p>"energy transfer module"</p> <ul style="list-style-type: none"> • '902 patent, claim 1 <p>"aliasing module"</p> <ul style="list-style-type: none"> • '725 patent, claim 1 <p>"system for frequency down-converting"</p> <ul style="list-style-type: none"> • '513 patent, claim 19 • '528 patent, claim 1 • '736 patent, claim 1 <p>"apparatus for down-converting"</p> <ul style="list-style-type: none"> • '673 patent, claim 13
"sample", "sampling", "sampled"	'518 patent, claim 50 '902 patent, claim 1 '725 patent, claim 1 '513 patent, claim 19 '528 patent, claim 1 '736 patent, claims 1 and 11 '673 patent, claims 1, 13, 17, and 19
"a capacitor that reduces a DC offset voltage in said first-down converted signal and said second down-converted signal"	'444 patent, claim 4
"the energy discharged during any given discharge cycle is not completely discharged"	'528 patent, claim 9 '736 patent, claims 1 and 11

Intel's Proposed Terms	Asserted Claim(s)
"DC offset voltage"	'444 patent, claim 4
"separate integration module"	'528 patent, claim 17
"a portion of energy that is distinguishable from noise"	'528 patent, claim 1
"substantially the same size"	'902 patent, claim 5
"reactive structure"	'518 patent, claim 50
<p><u>Energy Discharge Percentage Terms:</u></p> <p>"between six and fifty percent of the energy transferred from the RF information signal to the storage module is discharged from the storage module"</p> <p>"between six and twenty-five percent of the energy transferred from the RF information signal to the storage module when is discharged from the storage module"</p> <p>"between ten and twenty percent of the energy transferred from the RF information signal to the storage module discharged from the storage module"</p>	<p><u>Energy Discharge Percentage Terms:</u></p> <p>"between six and fifty percent of the energy transferred from the RF information signal to the storage module is discharged from the storage module"</p> <ul style="list-style-type: none"> • '725 patent, claim 17 <p>"between six and twenty-five percent of the energy transferred from the RF information signal to the storage module when is discharged from the storage module"</p> <ul style="list-style-type: none"> • '725 patent, claim 18 <p>"between ten and twenty percent of the energy transferred from the RF information signal to the storage module discharged from the storage module"</p> <ul style="list-style-type: none"> • '725 patent, claim 19

Dated: September 25, 2020

By: /s/ Jason F. Choy
J. Stephen Ravel
Texas State Bar No. 16584975
KELLY HART & HALLMAN LLP
303 Colorado Street, Suite 2000
Austin, TX 78701
Telephone: (512) 495-6429
Facsimile: (512) 495-6401
steve.ravel@kellyhart.com

James E. Wren
Texas State Bar No. 22018200
1 Bear Place, Unit 97288
Waco, Texas 76798
Telephone: (254) 710-7670
james.wren@baylor.edu

Michael J. Summersgill (*pro hac vice*)
Massachusetts State Bar No. 632816
Sarah B. Petty (*pro hac vice*)
Massachusetts State Bar No. 666485
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000
michael.summersgill@wilmerhale.com
sarah.petty@wilmerhale.com

Jason F. Choy (*pro hac vice*)
California State Bar No. 277583
WILMER CUTLER PICKERING
HALE AND DORR LLP
350 South Grand Avenue, Suite 2400
Los Angeles, CA 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400
jason.choy@wilmerhale.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Intel Corporation's Proposed Claim Terms was served on September 25, 2020 by electronic mail to all counsel of record who are deemed to have consented to electronic service in accordance with Local Rule CV-5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2020.

/s/ Jason F. Choy
Jason F. Choy