

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 CONSTRUCTIONS

Pursuant to the October 8, 2020 Amended Scheduling Order entered in this case, D.I. 48 at 1, Defendant Intel Corporation ("Intel") hereby discloses its proposed claim constructions to Plaintiff ParkerVision, Inc. ("ParkerVision").

Intel proposes claim constructions 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 proposed constructions, as well as its list of proposed claim terms, in view of ParkerVision's proposed claim constructions, including the right to adopt any claim terms or constructions 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

Proposed Term and Asserted Claim(s)	Intel's Proposed Construction
<p><u>Down-Converter Terms:</u></p> <p>“frequency down-conversion module” (’444 patent, claims 2, 3; ’474 patent, claim 1)</p> <p>“frequency down-conversion module” (’673 patent, claim 1)</p> <p>“universal frequency down-converter” (’518 patent, claim 50)</p> <p>“energy transfer module” (’902 patent, claim 1)</p> <p>“aliasing module” (’725 patent, claim 1)</p>	<p><u>Down-Converter Terms:</u></p> <p>“A module that down-converts an input signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the input signal)”</p> <p>“A module that down-converts an input modulated carrier signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the input modulated carrier signal)”</p> <p>“A down-converter that down-converts a carrier signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the carrier signal)”</p> <p>“A module that down-converts an electromagnetic signal by transferring energy at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the electromagnetic signal)”</p> <p>“A module that down-converts an RF information signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the RF information signal)”</p>

Proposed Term and Asserted Claim(s)	Intel's Proposed Construction
<p>“system for frequency down-converting” (’513 patent, claim 19; ’528 patent, claim 1; ’736 patent, claim 1)</p> <p>“apparatus for down-converting” (’673 patent, claim 13)</p>	<p>“A system that down-converts a modulated carrier signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the modulated carrier signal)”</p> <p>“An apparatus that down-converts a modulated carrier signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the modulated carrier signal)”</p>
<p>“sample”¹</p> <p>“sampling”</p> <p>“sampled”</p> <p>(’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)</p>	<p>“reduce a continuous-time signal to a discrete-time signal”</p> <p>“reducing a continuous-time signal to a discrete-time signal”</p> <p>“reduced to a discrete-time signal from a continuous-time signal”</p>
<p>“under-samples” (’444 patent, claim 2; ’474 patent, claim 6)</p>	<p>“samples at less than or equal to twice the frequency of the input signal using negligible apertures (i.e., pulse widths) that tend towards zero time in duration”</p>
<p>“a [] switch ... coupled to a [] reference potential” (’474 patent, claim 1)</p>	<p>“the switch shunts (i.e., diverts) current to a point held at a constant reference voltage”</p>
<p>“a capacitor that reduces a DC offset voltage in said first-down converted signal and said second down-converted signal” (’444 patent, claim 4)</p>	<p>“a capacitor that reduces a DC offset voltage in both said first down-converted signal and said second down-converted signal”</p>

¹ Intel is proposing a construction for “sample” only insofar as the term is used as a verb in the asserted claims.

Proposed Term and Asserted Claim(s)	Intel's Proposed Construction
"DC offset voltage" ('444 patent, claim 4)	"a DC voltage level that is added to a signal of interest by related circuitry"
"reactive structure" ('518 patent, claim 50)	"An electrical structure, such as a capacitor or inductor, that has reactance"
"the energy discharged during any given discharge cycle is not completely discharged" ('528 patent, claim 9; '736 patent, claims 1, 11)	Indefinite
"separate integration module" ('528 patent, claim 17)	Indefinite
"substantially the same size" ('902 patent, claim 5)	Indefinite
<u>Energy Discharge Percentage Terms:</u> "between six and fifty percent of the energy transferred from the RF information signal to the storage module is discharged from the storage module" ('725 patent, claim 17) "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" ('725 patent, claim 18) "between ten and twenty percent of the energy transferred from the RF information signal to the storage module discharged from the storage module" ('725 patent, claim 19)	Indefinite

ParkerVision's Proposed Terms

Proposed Term(s) and Asserted Claim(s)	Intel's Proposed Construction
"frequency down-conversion module" (’444 patent, claims 2, 3; ’474 patent, claim 1)	"A module that down-converts an input signal at an aliasing rate (i.e., by sampling at less than or equal to twice the frequency of the input signal)"
"energy storage element" (’528 patent, claim 1; ’513 patent, claim 19; ’736 patent, claims 1, 11)	"an element that stores a non-negligible amount of energy from an input electromagnetic (EM) signal"
"storage element" (’444 patent, claim 3; ’474 patent, claim 1)	"an element that stores a non-negligible amount of energy from an input electromagnetic (EM) signal"
"energy storage module" (’902 patent, claim 1)	"a module that stores a non-negligible amount of energy from an input electromagnetic (EM) signal"
"storage module" (’725 patent, claim 1)	"a module that stores a non-negligible amount of energy from an input electromagnetic (EM) signal"
"energy storage device" (’673 patent, claim 13)	"a device that stores a non-negligible amount of energy from an input electromagnetic (EM) signal"
"integrated" (’528 patent, claims 1, 17; ’518 patent, claim 50)	Plain and ordinary meaning, or in the alternative, "combined over time"
"modulated carrier signal" (’513 patent, claim 19; ’528 patent, claim 1; ’736 patent, claim 1; ’673 patent, claims 1, 13)	"a carrier signal that is modulated by a baseband signal"
"sampling aperture" (’513 patent, claim 19; ’528 patent, claim 1; ’736 patent, claims 1, 11; ’673 patent, claim 13)	"a period of time during which the claimed switch is in its closed (i.e., on) state in order to reduce a continuous-time signal to a discrete-time signal"

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