

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intel Corporation
Petitioner

v.

ParkerVision, Inc.
Patent Owner

Case No. IPR2020-01265
U.S. Patent No. 7,110,444

**PATENT OWNER'S RESPONSE TO PETITIONER'S IDENTIFICATION
OF IMPROPER NEW EVIDENCE AND ARGUMENTS IN SUR-REPLY**

Pursuant to the Board’s Order (Paper 31), Patent Owner hereby responds to Petitioner’s identification of portions of Patent Owner’s Sur-Reply purportedly containing arguments and evidence exceeding the proper scope of a sur-reply.

Petitioner’s Identification of Improper Arguments and Evidence in Patent Owner’s Sur-Reply (Paper 26)	Patent Owner’s Citations to Papers and Exhibits
Paper 26 at page 1, line 5 parenthetical (“near zero”)	Paper 21 (Reply) at 18:19-19:3; 19:8-10; 20:3-6 Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14 Paper 18 (Response) at 47:17-20; 54:5-7; 62:11-13; 63:15-64:5 Ex. 2021 (Steer Decl.) at ¶¶ 264, 271, 287
Paper 26 at page 1, lines 7-11	Paper 21 (Reply) at 19:1-20:8 Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 10, 12-13 Paper 18 (Response) 34:6-8 (including figures on page 34); 35:1-3, 6-12; 36:1-5; 62:1-13; 63:15-64:5; 65:2-14 Ex. 2021 (Steer Decl.) at ¶¶ 164, 172-174, 199-207, 258-264, 266-270
Paper 26 at page 7, line 10 parenthetical (“near zero”)	Paper 21 (Reply) at 18:19-19:3; 19:8-10; 20:3-6

	<p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p> <p>Paper 18 (Response) at 47:17-20; 54:5-7; 62:11-13; 63:15-64:2</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 264, 271, 287</p>
<p>Paper 26 at page 15, lines 3-6</p>	<p>Paper 21 (Reply) at 18:13-14; 18:19-19:3; 20:3-4</p> <p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p>
<p>Paper 26 at page 15, lines 7-9</p>	<p>Paper 21 (Reply) at 18:13-14; 18:18-19:3</p> <p>Paper 18 (Response) at 11:9-10; 32:2-6; 34:6-8; 35:6-8; 47:10-48:2; 49:14-50:6</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 50-54, 164, 166, 197</p>
<p>Paper 26 at page 15, lines 7-9 (including the following figure on page 16)</p>	<p>Paper 21 (Reply) at 18:13-14; 18:18-19:3</p> <p>Paper 18 (Response) at 11:9-10; 32:2-6; 34:6-8 (including figures on page 34); 35:6-8; 47:10-48:2; 49:14-50:6</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 50-54, 164, 166, 197</p>
<p>Paper 26 at page 16, lines 1-8 following the figure</p>	<p>Paper 21 (Reply) at 18:13-14; 18:18-19:3; 19:8-10; 20:2-4</p>

	<p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p> <p>Paper 18 (Response) at 61:6-11; 62:16-64:5</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 50, 83, 258-264</p>
<p>Paper 26 at page 17, line 7 parenthetical (“near zero”)</p>	<p>Paper 21 (Reply) at 18:19-19:3; 19:8-10; 20:3-6</p> <p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p> <p>Paper 18 (Response) at 47:17-20; 54:5-7; 62:11-13; 63:15-64:5</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 264, 271, 287</p>
<p>Paper 26 at page 17, line 9 to page 18, line 2 (including footnote 14)¹</p>	<p>Paper 21 (Reply) at 18:13-14; 18:18-19:3; 19:8-10; 20:2-4</p> <p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p> <p>Paper 18 (Response) at 61:6-8, 11-12; 62:16-64:5</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 50-54, 164, 258-264</p>
<p>Paper 26 at page 18, lines 3-5 (including footnote 15)</p>	<p>Paper 21 (Reply) at 19:1-20:8</p>

¹ Footnotes are excluded from Petitioner’s line ranges unless otherwise specified.

	<p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 10-13</p> <p>Paper 18 (Response) 34:6-8 (including figures on page 34); 35:1-3, 6-12; 36:1-5; 62:1-13; 63:15-64:5; 65:2-14</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 164, 172-174, 199-207, 258-264, 266-270</p>
Paper 26 at page 18, lines 7-9	<p>Paper 21 (Reply) at 18:13-14; 18:19-19:3; 19:8-10; 20:3-4</p> <p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p> <p>Paper 18 (Response) at 61:6-8, 11-12; 62:1-10; 63:1-10</p> <p>Ex. 2021 (Steer Decl.) at ¶¶ 54, 246-250, 255-256, 259-260</p>
Paper 26 at page 19, lines 1-4	<p>Paper 21 (Reply) at 18:13-14; 18:19-19:3; 19:8-10; 20:3-4</p> <p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p>
Paper 26 at page 20, lines 4-8	<p>Paper 21 (Reply) at 18:13-14; 18:19-19:3; 19:8-10; 20:3-4</p> <p>Ex. 1030 (Subramanian Reply Decl.) at ¶¶ 6-14</p>
Paper 26 at page 20, lines 9-13 (including footnote 17)	<p>Paper 21 (Reply) at 18:13-14; 18:19-19:3; 19:8-10; 20:3-4</p>

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