

IPR2020-01265

U.S. Patent No. 7,110,444

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Intel Corporation  
Petitioner

v.

ParkerVision, Inc.  
Patent Owner

U.S. Patent No. 7,110,444

Issue Date: September 19, 2006  
Title: WIRELESS LOCAL AREA NETWORK  
(WLAN) USING UNIVERSAL FREQUENCY  
TRANSLATION TECHNOLOGY INCLUDING  
MULTI-PHASE EMBODIMENTS AND  
CIRCUIT IMPLEMENTATIONS

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*Inter Partes* Review No. IPR2020-01265

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**PATENT OWNER'S SUPPLEMENTAL NOTICE  
REGARDING CLAIM CONSTRUCTION**

Patent Owner ParkerVision, Inc. respectfully submits this supplemental notice regarding the Special Master’s Recommended Claim Constructions, dated October 29, 2021,<sup>1</sup> in *ParkerVision, Inc. v. Hisense Co., Ltd. et al.*, 6-20-CV-00870 ADA (USDC WDTX) and *ParkerVision v. TCL Holdings Co., Ltd. et al.*, 6-CV-00945 ADA (USDC WDTX), (collectively, the “Hisense and TCL cases”).

The District Court has again considered the term “storage element” in claim 3 of U.S. Patent No. 7,110,444 (“the ’444 patent”) – the same claim term at issue in IPR2020-01265 before this Board.

By way of background, on October 25, 2021, the Court appointed Dr. Josh Yi, who holds a J.D. and Ph.D. in Electrical Engineering, as the Special Master to recommend claim constructions in the Hisense and TCL cases. Dr. Yi previously served as a law clerk and technical advisor to Judge Albright in both pending *ParkerVision Inc. v. Intel* cases and was involved in the Court’s constructions in those cases.

In the Hisense and TCL cases, after the parties submitted two rounds of briefs, a Markman hearing was held before Dr. Yi on October 27, 2021. One of the

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<sup>1</sup> Though the Recommended Claim Constructions were dated October 29, 2021, they were not issued through the Court’s ECF system until yesterday on November 1, 2021, after the hearing before the Board.

arguments in the briefing and during the hearing related to the construction of “storage element” in claim 3 of the ’444 patent. In their briefs and at the Markman hearing, the arguments that Hisense and TCL raised were the same arguments that Intel raised in IPR proceeding before this Board and in the District Court, including arguments related to the interpretation of “storage module” in IPR2014-00948.

In his Recommended Claim Constructions, and consistent with the District Court’s prior constructions, the Special Master recommends “storage element” to be construed as “an element of an energy transfer system that stores nonnegligible amounts of energy from an input electromagnetic signal.” *See attached* (October 29, 2021 Recommended Claim Constructions at 5 of 16). The Special Master stated that the full Report and Recommendation explaining the basis for his recommendations will be issued as soon as is practicable. *Id.* at 1.

Dated: November 2, 2021

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PATENT OWNER'S SUPPLEMENTAL NOTICE REGARDING CLAIM CONSTRUCTION, was served by filing the document through the PTAB E2E System, as well as by email on the following counsel of record for Petitioner:

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Dated: November 2, 2021

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