UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,
 	
                        Plaintiff,
 	
            v.
 	
INTEL CORPORATION,
 	
                        Defendant.
	Case No. 6:20-cv-00108
	
	JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff ParkerVision, Inc. ("ParkerVision"), by and through its counsel, files this Complaint against Defendant Intel Corporation ("Intel") for patent infringement of United States Patent Nos. 6,049,706; 6,580,902; 7,110,444; 7,539,474; 8,588,725; 8,660,513; 9,246,736 and 9,444,673 (the "patents-in-suit") (Exhibits 1-8) and alleges as follows:

NATURE OF THE ACTION

1.   This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

PARTIES

2.   Plaintiff ParkerVision is a Florida corporation with its principal place of business at 9446 Philips Highway, Jacksonville, Florida 32256.

3.   On information and belief, Defendant Intel is a Delaware corporation with a place of business at 2200 Mission College Boulevard, Santa Clara, California 95054.

4.   On information and belief, Intel has places of business in this judicial district: 1300 S Mopac Expressway, Austin, Texas 78746; 6500 River Place Blvd, Bldg 7, Austin, Texas 78730 and 5113 Southwest Parkway, Austin, Texas 78735 (collectively, "Austin Offices"). https://www.intel.com/content/www/us/en/location/usa.html.

5.   Intel can be served with process through its registered agent for service in Texas: CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201.

6.   On information and belief, since April 1989, Intel has been registered to do business in the State of Texas under Texas Taxpayer Number 19416727436.

JURISDICTION AND VENUE

7.   This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the action arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

8.   Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b), (c), (d) and/or 1400(b).

9.   Intel is subject to this Court's personal jurisdiction, in accordance with due process and/or the Texas Long Arm Statute because Intel "[r]ecruits Texas residents, directly or through an intermediary located in this state, for employment inside or outside this state." *See* Tex. Civ. Prac. & Rem. Code § 17.042.

10.   This Court has personal jurisdiction over Intel because Intel has sufficient minimum contacts with this forum as a result of business conducted within the State of Texas and this judicial district. In particular, this Court has personal jurisdiction over Intel because, *inter alia*, Intel, on information and belief: (1) has substantial, continuous,

and systematic business contacts in this judicial district; (2) owns, manages and operates facilities in this judicial district; (3) enjoys substantial income from its operations in this judicial district, and (4) employs Texas residents in this judicial district.

11.   Intel has purposefully availed itself of the privileges of conducting business within this judicial district; has established sufficient minimum contacts with this judicial district such that it should reasonably and fairly anticipate being hauled into court in this judicial district; has purposefully directed activities at residents of this judicial district; and at least a portion of the patent infringement claims alleged in this Complaint arise out of or are related to one or more of the foregoing activities.

12.   This Court also has personal jurisdiction over Intel because Intel, directly and/or through its subsidiaries, affiliates, or intermediaries, makes, uses, offers for sale, sells, imports, advertises, makes available and/or markets infringing products in the United States, the State of Texas and/or this judicial district, as described more particularly below.

13.   On information and belief, Intel maintains a significant physical presence in this judicial district.

14.   On information and belief, Intel uses its Austin Offices as a regular and established place of business. On information and belief, Intel has employed over 1700 current and former employees in the Austin area. https://www.linkedin.com/company/intel-corporation/people/?facetGeoRegion= us%3A64.

15.   Intel describes its operations in Austin on its website: "Located in the capitol city of Texas, Intel Austin is an important research and development center for the Intel technology that is changing the way we live, work, and play. Among the innovations developed in Austin are core technologies for next-generation microprocessors, platforms and base software; groundbreaking silicon solutions for computing and communications devices, which include handheld computing and cellular communications; and cutting-edge network storage products." https://www.intel.com/content/www/us/en/jobs/locations/united-states/sites/austin.html.

16.   On information and belief, Intel has hundreds of H-1B labor condition applications for people employed in Austin, Texas. https://h1bsalary.online/search?searchtext=INTEL+CORPORATION&year=&minsalary=&state=&worksite_city=AUSTIN&job_title=. Employees holding an H-1B visa are employed in a specialty occupation that requires "theoretical and practical application of a body of highly specialized knowledge . . . and attainment of a bachelor's or higher degree in the specific specialty." *See generally* 8 U.S.C. § 1184. As such, Intel employees in Austin, Texas are highly specialized and important to the operation of Intel.

17.   Intel lists job openings on its website for positions in Austin, Texas.

https://jobs.intel.com/ListJobs/All/Search/state/tx/ (visited on 1/7/2020).

18.   On information and belief, Intel has litigated/is litigating cases before this Court in which it admitted that venue was proper, did not contest personal jurisdiction, and/or filed counterclaims. *See, e.g., Flash-Control, LLC v. Intel Corp.*, Case No. 1:19-cv-01107 (W.D. Tex.); *VLSI Tech. LLC v. Intel Corp.*, Case No. 1:19-cv-00977 (W.D. Tex.).

BACKGROUND

19.   In 1989, Jeff Parker and David Sorrells started ParkerVision in Jacksonville, Florida. Through the mid-1990s, ParkerVision focused on developing

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