

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PARKERVISION, INC.

Plaintiff,

vs.

INTEL CORPORATION

Defendant.

C.A. No. 6:20-cv-00108-ADA

JURY TRIAL DEMANDED

**DEFENDANT INTEL CORPORATION'S
PRELIMINARY INVALIDITY CONTENTIONS**

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I. INTRODUCTION

Pursuant to the Court’s Scheduling Order (D.I. 34), Defendant Intel Corporation (“Intel”) hereby provides the following Preliminary Invalidity Contentions with respect to 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”), which Plaintiff ParkerVision Inc. (“ParkerVision”) has asserted against Intel.

Intel has petitioned for *Inter Partes* Review of claims 1, 3, and 5 of the ’444 patent (Case IPR2020-01265) and claims 1, 3, 4, 7, and 9-12 of the ’474 patent (Case IPR2020-01302), and hereby incorporates those petitions, including the declarations supporting those petitions, and any subsequent proceedings before the U.S. Patent Trial and Appeal Board related to those petitions herein by reference.

In ParkerVision’s Preliminary Infringement Contentions served on June 26, 2020 and Amended Disclosure of Preliminary Contentions served on August 27, 2020, ParkerVision provided infringement contentions for the forty-nine claims identified below (the “Asserted Claims”):

Patent	Asserted Claims
6,266,518	50, 67
6,580,902	1, 2, 4, 5
7,110,444	2, 3, 4
7,539,474	1, 6, 10, 11
8,588,725	1, 6, 7, 13, 14, 16, 17, 18, 19
8,660,513	19, 24, 27, 28
9,118,528	1, 5, 9, 14, 15, 17
9,246,736	1, 11, 15, 19, 21, 26, 27
9,444,673	1, 2, 5, 6, 7, 13, 16, 17, 18, 19

See ParkerVision’s Preliminary Infringement Contentions (June 26, 2020) (“Preliminary Infringement Contentions”) at 2; ParkerVision’s Amended Disclosure of Preliminary Infringement

Pages 2-58 Omitted for Relevance.

does not disclose a combination of these three variations or how such a combination could be accomplished. The patent fails to teach those skilled in the art how to make and use the full scope of the claimed feature and fails to disclose an invention understandable to a skilled artisan or show that the inventor actually invented the alleged invention claimed.

Claim 2 of the '673 patent is invalid for lack of written description. Claim 2 requires that the “voltage of the input modulated carrier signal is not reproduced or approximated at the capacitor during the apertures or outside of the apertures.” The claim, when read in light of the specification and the prosecution history, fail to inform, with reasonable certainty, those skilled in the art about the scope of the invention. For example, it is unclear what voltage would “reproduce” or “approximate” an input signal. For at least these same reasons, the patent specification fails to disclose, support, or enable such a feature, and the patent fails to show that the inventor actually invented the alleged invention claimed.

Dated: September 11, 2020

Respectfully submitted,

By: /s/ Jason Choy

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