

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCL INDUSTRIES HOLDINGS CO., HISENSE CO., LTD.,
and LG ELECTRONICS INC.

Petitioners,

v.

PARKERVISION, INC.

Patent Owner

Case No. IPR2021-00985¹
Patent No. 7,292,835

PETITIONERS' REPLY

¹ LG Electronics Inc., who filed a petition in IPR2022-00246, is joined as a petitioner in this proceeding.

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TCL Industries Holdings Co., Ltd. and Hisense Co., Ltd. (“Petitioners”) submit this Reply to Patent Owner’s (“ParkerVision”) Response (“POR”).

I. INTRODUCTION

ParkerVision does not contest that the prior art renders obvious almost every element of the challenged claims. And ParkerVision chose not to cross-examine Petitioners’ expert, Dr. Shoemake, whose direct testimony now stands unchallenged. ParkerVision disputes the disclosure of only two elements: “storage module” and “cable modem.” ParkerVision also argues that certain references cannot be combined—even though such references disclose highly similar and well-known circuitry for down-converting a modulated signal. None of ParkerVision’s arguments, however, demonstrates the patentability of any challenged claim.

First, ParkerVision argues that the prior art does not disclose a “storage module.” That argument is premised in part on ParkerVision’s attempt to read in an “*energy transfer system*” requirement into the construction of the term. POR at 67-68, 77-78. The Board previously rejected this exact same construction in a final decision. Ex. 2037 at 29-41 (“storage element” means “an element of a system that stores non-negligible amounts of energy from an input EM signal.”) The Board should reject ParkerVision’s argument again here.

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