

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioners

v.

PARKERVISION, INC.

Patent Owner

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Case No. IPR2021-00985<sup>1</sup>  
Patent No. 7,292,835

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**PETITIONERS' OPPOSITION TO PATENT OWNER'S MOTION TO  
STRIKE PORTIONS OF PETITIONERS' REPLY**

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

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## I. INTRODUCTION

The “exceptional remedy” of striking portions of the Reply is not warranted.

*First*, the Reply does not contain any “new theory.” Exactly like the Petition, it explains how certain prior art references disclose “storage” modules in the form of switched-capacitors used to down-convert an RF signal. This showing is consistent with, and more detailed than, ParkerVision’s own infringement argument, *i.e.*, that a “storage” module is simply “one or more capacitors.” Reply at 6 (citing Complaints).

ParkerVision attempted to narrow the claims to avoid prior art in the POR. Specifically, the POR newly argues that a capacitor is not a “storage” module unless its stored energy is more than some unspecified fraction of the “total available energy.” As would be expected, Petitioners’ Reply highlights the inconsistencies between ParkerVision’s positions (*i.e.*, those adopted during litigation versus its newfound position in the POR). Specifically, it shows that ParkerVision previously argued that energy merely “distinguishable from noise” is non-negligible. Reply at 9-12. And under that meaning, the lead inventor on the ’835 patent testified that when a circuit performs down-conversion that is “proof” that its storage module had non-negligible energy. *Id.* The Federal Circuit accepted ParkerVision’s position as to the meaning of “non-negligible.” *See id.*

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