IPR2021-00985 U.S. Patent No. 7,292,835 Patent Owner's Preliminary Response

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCL INDUSTRIES HOLDINGS CO., LTD., HISENSE CO., LTD., and ZYXEL COMMUNICATIONS CORP. Petitioners,

v.

ParkerVision, Inc. Patent Owner.

U.S. Patent No. 7,292,835 Issue Date: November 6, 2007 Title: WIRELESS AND WIRED CABLE MODEM APPLICATIONS OF UNIVERSAL FREQUENCY TRANSLATION TECHNOLOGY

Inter Partes Review No. IPR2021-00985

PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR INTER PARTES REVIEW OF UNITED STATES PATENT NO. 7,292,835

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| <i>E-One, Inc. v. Oshkosh Corp.</i> , IPR2019-00161, Paper 16 (PTAB May 15, 2019)7 |
| <i>Apple Inc. v. Fintiv,</i> IPR2020-00019, Paper 15 (PTAB May 13, 2020)6, 7, 9 |
| Google LLC v. Personalized Media Commc'ns, LLC, IPR2020-00720, Paper 16 (PTAB Aug. 31, 2020) |
| Kerr Machine Co. d/b/a Kerr Pumps v. Vulcan Industrial Holdings, LLC, 6:20-cv-00200 (W.D. Tex. Aug. 2, 2020) |
| <i>Multimedia Content Mgmt. LLC v. Dish Network Corp.</i> , No. 6:18-cv-00207-ADA, 2019 U.S. Dist. LEXIS 198875 (W.D. Tex. Jan. 10, 2019) |
| Next Caller, Inc. v. TrustID, Inc., IPR2019-00961, Paper 10 (PTAB Oct. 16, 2019)9 |
| NHK Spring Co. v. Intri-Plex Techs., Inc., IPR2018-00752, Paper 8 (PTAB Sept. 12, 2018) |
| Nine Energy Service Inc. v. MCS Multistage Inc., IPR2020-01615, Paper 18 (PTAB Mar. 24 2021) |
| Vizio, Inc. v. Polaris PowerLED Techs., LLC, IPR2020-00043, Paper 30 (PTAB May 4, 2020)9 |
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| 35 U.S.C. § 316(b) | 3 |
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PATENT OWNER'S EXHIBIT LIST

| Exhibit No. | Description |
|-------------|--|
| 2001 | Complaint, ParkerVision, Inc. v. Hisense Co., Ltd. et al., Case No. 6:20-cv-00870 (WDTX) |
| 2002 | Complaint, ParkerVision, Inc. v. TCL Industries Holdings Co., Ltd. et al., Case No. 6:20-cv-00945 (WDTX) |
| 2003 | Scheduling Order, <i>ParkerVision, Inc. v. TCL Industries</i> <i>Holdings Co., Ltd. et al.</i> , Case No. 6:20-cv-00945 (WDTX) |
| 2004 | Scheduling Order, ParkerVision, Inc. v. Hisense Co., Ltd. et al., Case No. 6:20-cv-00870 (WDTX) |
| 2005 | Published Interview of Judge Albright, IAM (Apr. 7, 2020) |
| 2006 | Docket Order, <i>Kerr Machine Co. d/b/a Kerr Pumps v.</i> <i>Vulcan Industrial Holdings, LLC</i> , No. 6:20-cv-00200 (W.D. Tex. Aug. 2, 2020) |
| 2007 | Relevant Excerpts of Defendant's Preliminary Invalidity Contentions, filed in <i>ParkerVision, Inc. v. TCL Industries</i> <i>Holdings Co., Ltd. et al.</i> , Case No. 6:20-cv-00945 (WDTX) |
| 2008 | Relevant Excerpts of Defendant's Preliminary Invalidity Contentions, filed in <i>ParkerVision, Inc. v. Hisense Co., Ltd.</i> <i>et al.</i> , Case No. 6:20-cv-00870 (WDTX) |
| 2009 | Hearing transcript from <i>ParkerVision, Inc. v. Intel Corp.</i> , Case No. 6:20-cv-00108 (W.D. Texas, Sept. 2, 2020) |

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