

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

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCL Industries Holdings Co., Ltd. and Hisense Co., Ltd.,
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 UPDATED EXHIBIT LIST

Exhibit No.	Description
2001	Complaint, <i>ParkerVision, Inc. v. Hisense Co., Ltd. et al.</i> , Case No. 6:20-cv-00870 (WDTX)
2002	Complaint, <i>ParkerVision, Inc. v. TCL Industries Holdings Co., Ltd. et al.</i> , Case No. 6:20-cv-00945 (WDTX)
2003	Scheduling Order, <i>ParkerVision, Inc. v. TCL Industries Holdings Co., Ltd. et al.</i> , Case No. 6:20-cv-00945 (WDTX)
2004	Scheduling Order, <i>ParkerVision, Inc. v. Hisense Co., Ltd. et al.</i> , Case No. 6:20-cv-00870 (WDTX)
2005	Published Interview of Judge Albright, <i>IAM</i> (Apr. 7, 2020)
2006	Docket Order, <i>Kerr Machine Co. d/b/a Kerr Pumps v. 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 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. 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)
2010	ZyXEL Corp. [Confidential] Settlement Agreement
2011	Claim Construction Order, <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00108-ADA (W.D. Tex.)
2012	Claim Construction Order, <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562-ADA (W.D. Tex.)
2013	Amended Claim Construction Order, <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562-ADA (W.D. Tex.)
2014	Special Master's Recommended Claim Constructions, <i>ParkerVision, Inc. v. Hisense Co., Ltd. et al.</i> , No. 6:20-cv-00870-ADA (W.D. Tex.)
2015	Special Master's Recommended Claim Constructions, <i>ParkerVision, Inc. v. TCL Industries Holdings Co.</i> , No. 6:20-cv-00945-ADA (W.D. Tex.)
2016	"Transistor," <i>The American Heritage College Dictionary</i> (3rd ed. 1997)
2017	U.S. Patent No. 5,969,545
2018	U.S. Patent No. 6,531,931
2019	U.S. Patent No. 5,614,855

2020	Donald Christiansen, <i>Electronics Engineers' Handbook</i> (4 th ed. 1996)
2021	Richard C. Jaeger, <i>Microelectronic Circuit Design</i> (1997)
2022	Rudolf Graf, <i>Modern Dictionary of Electronics</i> (7th ed. 1999)
2023	J. Crols, "A 1.5 GHz Highly Linear CMOS Downconversion Mixer, IEEE J. Solid-State Circuits, Vol. 30, No.7, pp. 736-742, July 1995
2024	A. Rofougaran, J. Chang, M. Rofougaran, and A. Abidi, "A 1 GHz CMOS RF Front-End IC for a Direct-Conversion Wireless Receiver," IEEE J. Solid-State Circuits, Vol. 31, No. 7, pp. 880-889, July 1996
2025	B. Razavi, "Challenges in Portable RF Transceiver Design," IEEE Circuits and Devices, Vol. 12, No. 5, pp. 12-25, Sept. 1996
2026	G. Wegmann, E. Vittoz, F. Rahali, "Charge Injection in Analog MOS Switches," IEEE J. Solid-State Circuits, Vol. sc-22, No. 6, pp. 1091-1097, December 1987
2027	U.S. Patent No. 6,061,551
2028	B. Razavi, "CMOS RF receiver design for wireless LAN applications," IEEE Radio and Wireless Conference, pp. 275-280, Aug. 1999
2029	Qualcomm Email dated Aug. 11, 1998
2030	Qualcomm Email dated Feb. 2, 1999
2031	Qualcomm Email dated Oct. 7, 1998
2032	Qualcomm Email dated Feb. 4, 1999
2033	J. Candy, G. Temes, "Oversampling Delta-Sigma Data Converters: Theory, Design, and Simulation," (1992)
2034	Thomas L. Floyd, <i>Principles of Electric Circuits</i> (5 th ed. 1997)
2035	David M. Pozar, <i>Microwave Engineering</i> (2 nd ed. 1998)
2036	Graphic Symbols for Electrical and Electronics Diagrams, IEEE Standards Coordinating Committee 11 (1975)
2037	Final Written Decision, <i>Intel Corp. v. ParkerVision, Inc.</i> , IPR2020-01265 (Jan. 21, 2022)
2038	Declaration of Dr. Michael Steer
2039	Claim Construction Order, <i>ParkerVision, Inc. v. LG Elecs., Inc.</i> , No. 6:21-cv-00520-ADA (W.D. Tex.)
2040	Patent Owner's Demonstratives for Oral Argument

Dated: August 31, 2022

Respectfully Submitted,

By: /Jason S. Charkow/

Jason S. Charkow (USPTO Reg. No. 46,418)*

Chandran B. Iyer (USPTO Reg. No. 48,434)

Stephanie R. Mandir (USPTO Reg. No. 72,930)

jcharkow@daignaultiyer.com

cbiyer@daignaultiyer.com

smandir@daignaultiyer.com

DAIGNAULT IYER LLP

8618 Westwood Center Drive - Suite 150

Vienna, VA 22182

*Not admitted in Virginia

Attorneys for ParkerVision, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing Patent Owner's Updated Exhibit List along with Patent Owner's Demonstratives for Oral Argument (Exhibit 2040), were served in their entirety by filing these documents through the PTAB E2E System, as well as by email on the following counsel of record for Petitioner:

Kristopher L. Reed
kreed@kilpatricktownsend.com
Edward J. Mayle
tmayle@kilpatricktownsend.com
Kilpatrick Townsend & Stockton LLP
1400 Wewatta St. Suite 600
Denver, CO 80202

Matias Ferrario
mferrario@kilpatricktownsend.com
Kilpatrick Townsend & Stockton LLP
1001 West Fourth Street
Winston-Salem, NC 27101-2400

Dated: August 31, 2022

Respectfully submitted,

By: /Jason S. Charkow/
Jason S. Charkow
USPTO Reg. No. 46,418