

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,

Plaintiff,

v.

HISENSE CO., LTD. and HISENSE
VISUAL TECHNOLOGY CO., LTD.
(F/K/A QINGDAO HISENSE
ELECTRONICS CO., LTD. and
HISENSE ELECTRIC CO., LTD.)

Defendants.

Case No. 6:20-cv-00870

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff ParkerVision, Inc. ("ParkerVision"), by and through its undersigned counsel, files this Complaint against Defendants Hisense Co., Ltd. and Hisense Visual Technology Co., Ltd. (f/k/a Qingdao Hisense Electronics Co., Ltd. and Hisense Electric Co., Ltd.) (collectively, "Hisense" or "Defendants") for patent infringement of United States Patent Nos. 6,049,706; 6,266,518; 6,580,902; 7,110,444; 7,292,835; 8,588,725; 8,660,513; 9,118,528; 9,246,736 and 9,444,673 (the "patents-in-suit") and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

PARTIES

2. Plaintiff ParkerVision is a Florida corporation with its principal place of business at 9446 Philips Highway, Jacksonville, Florida 32256.

3. Defendant Hisense Co., Ltd. is a foreign corporation duly organized and existing under the laws of the People's Republic of China, with a principal place of business at Hisense Tower, No. 17 Donghaixi Road, Qingdao, Shandong Province, 266071, P.R. China. Hisense Co., Ltd. is a parent corporation of Defendant Hisense Visual Technology Co., Ltd.

4. Defendant Hisense Visual Technology Co., Ltd. is a foreign corporation duly organized and existing under the laws of the People's Republic of China, with a principal place of business at No. 218, Qianwangang Road, Economic and Technological Development Zone, Qingdao, Shandong Province, 266555, P.R. China. Hisense Visual Technology Co., Ltd. formerly did business under the names Qingdao Hisense Electronics Co., Ltd. and Hisense Electric Co., Ltd.

5. On information and belief, Defendants act in concert to design, manufacture, sell, offer for sale, import, distribute, advertise, and/or otherwise promote the accused infringing products in the United States, the State of Texas, and this judicial district.

JURISDICTION AND VENUE

6. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the action arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq.*

7. Hisense is subject to this Court's personal jurisdiction in accordance with due process and/or the Texas Long-Arm Statute. *See* Tex. Civ. Prac. & Rem. Code §§ 17.041 *et seq.*

8. This Court has personal jurisdiction over Hisense because Hisense has sufficient minimum contacts with this forum as a result of business conducted within the State of Texas and this judicial district. In particular, this Court has personal jurisdiction over Hisense because, *inter alia*, Hisense, on information and belief, has substantial, continuous, and systematic business contacts in this judicial district, and derives substantial revenue from goods provided to individuals in this judicial district.

9. Hisense has purposefully availed itself of the privileges of conducting business within this judicial district, has established sufficient minimum contacts with this judicial district such that it should reasonably and fairly anticipate being hauled into court in this judicial district, has purposefully directed activities at residents of this judicial district, and at least a portion of the patent infringement claims alleged in this Complaint arise out of or are related to one or more of the foregoing activities.

10. This Court has personal jurisdiction over Hisense because Hisense (directly and/or through its subsidiaries, affiliates, or intermediaries) has committed and continues to commit acts of infringement in this judicial district in violation of at least 35 U.S.C. § 271(a). In particular, on information and belief, Hisense uses, sells, offers for sale, imports, advertises, and/or otherwise promotes infringing products in the United States, the State of Texas, and this judicial district.

11. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) – (d) and/or 1400(b). Hisense is registered to do business in the State of Texas, maintains a regular and established place of business within this judicial district, and has committed acts of infringement in this judicial district.

BACKGROUND

12. In 1989, Jeff Parker and David Sorrells started ParkerVision in Jacksonville, Florida. Through the mid-1990s, ParkerVision focused on developing commercial video cameras, e.g., for television broadcasts. The cameras used radio frequency (RF) technology to automatically track the camera's subject.

13. When developing consumer video cameras, however, ParkerVision, encountered a problem – the power and battery requirements for RF communications made a cost effective, consumer-sized product impractical. So, Mr. Sorrells and ParkerVision's engineering team began researching ways to solve this problem.

14. At the time, a decade's-old RF technology called super-heterodyne dominated the consumer products industry. But this technology was not without its own problems – the circuitry was large and required significant power.

15. From 1995 through 1998, ParkerVision engineers developed an innovative method of RF direct conversion by a process of sampling a RF carrier signal and transferring energy to create a down-converted baseband signal.

16. After creating prototype chips and conducting tests, ParkerVision soon realized that its technology led to improved RF receiver performance, lower power

consumption, reduced size and integration benefits. In other words, RF receivers could be built smaller, cheaper and with greater improved performance.

17. ParkerVision's innovations did not stop there. ParkerVision went on to develop additional RF down-conversion technologies, RF up-conversion technologies and other related direct-conversion technologies. ParkerVision also developed complementary wireless communications technologies that involved interactions, processes, and controls between the baseband processor and the transceiver, which improved and enhanced the operation of transceivers that incorporate ParkerVision's down-converter and up-converter technologies. To date, ParkerVision has been granted over 200 patents related to its innovations including, the patents-in-suit.

18. ParkerVision's technology helped make today's wireless devices, such as televisions, a reality by enabling RF chips used in these devices to be smaller, cheaper, and more efficient, and with higher performance.

HISENSE

19. Hisense Co., Ltd. is a Chinese multinational electronics company headquartered in Qingdao, China. On information and belief, Hisense Visual Technology Co., Ltd. is a subsidiary of Hisense Co., Ltd.

20. On information and belief, since at least 2010, Hisense (or those acting on its behalf) has made, used, sold, offered for sale and/or imported televisions ("Hisense TVs") in/into the United States. <https://hdguru.com/hisense-targets-the-us-hdtv-market/>.

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