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13 *Attorneys for Plaintiff ParkerVision, Inc.*

14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA

11 PARKERVISION, INC., 12 13 Plaintiff, 14 15 v 16 17 TCL TECHNOLOGY GROUP CORP. 18 19 and TTE TECHNOLOGY, INC., 20 21 Defendants.	22 Case No. 23 24 COMPLAINT FOR PATENT 25 INFRINGEMENT 26 27 JURY TRIAL DEMANDED 28
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19 Plaintiff ParkerVision, Inc. (“ParkerVision”), by and through its undersigned
 20 counsel, files this Complaint against Defendants TCL Technology Group Corp.
 21 and TTE Technology, Inc. (collectively, “TCL”) for patent infringement of United
 22 States Patent Nos. 6,049,706; 6,266,518; 6,580,902; 7,110,444; 7,292,835;
 23 8,588,725; 8,660,513; 9,118,528; 9,246,736 and 9,444,673 (the “patents-in-suit”)
 24 (Exhibits 1-10) and alleges as follows:

25 **NATURE OF THE ACTION**

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

28 ///

1 **PARTIES**

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

4 3. On information and belief, TCL Technology Group Corp. (f/k/a TCL
5 Corporation) (“TCL Group”) is a foreign corporation duly organized under the
6 laws of the People’s Republic of China with a principal place of business located at
7 22/F, TCL Technology Bldg., No. 17, Huifeng 3rd Rd., Zhongkai Hi-Tech
8 Development District, Huizhou, Guangdong, 516000 China. On information and
9 belief, TCL Group is a parent of Defendant TTE Technology, Inc.

10 4. On information and belief, Defendant TTE Technology, Inc. (d/b/a
11 TCL North America and TCL USA) (“TCL USA”) is a Delaware corporation with
12 its principal place of business at 1860 Compton Avenue, Corona, California 92881.

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

17 **JURISDICTION AND VENUE**

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

21 7. TCL is subject to this Court’s personal jurisdiction in accordance
22 with due process and/or the California Long-Arm Statute, California Code of Civil
23 Procedure § 410.10.

24 8. This Court has personal jurisdiction over TCL because TCL has
25 sufficient minimum contacts with this forum as a result of business conducted
26 within the State of California and this judicial district. In particular, this Court has
27 personal jurisdiction over TCL because, *inter alia*, TCL, on information and belief,
28 has substantial, continuous, and systematic business contacts in this judicial

1 district, and derives substantial revenue from goods provided to individuals in this
2 judicial district.

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

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

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

20 **BACKGROUND**

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

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

1 this problem.

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

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

8 16. After creating prototype chips and conducting tests, ParkerVision
9 soon realized that its technology led to improved RF receiver performance, lower
10 power consumption, reduced size and integration benefits. In other words, RF
11 receivers could be built smaller, cheaper and with greater improved performance.

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

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

24 **TCL**

25 19. TLC Group is a Chinese multinational electronics company
26 headquartered in Huizhou, Guangdong Province, China. On information and belief,
27 TCL USA is the United States subsidiary of TCL Group.

28 20. On information and belief, since 2014, TCL USA (or those acting on

1 its behalf) has made, used, sold, offered for sale and/or imported televisions (“TCL
2 Products”) in/into the United States. [https://www.tclusa.com/about-us/press-](https://www.tclusa.com/about-us/press-releases/tcl-celebrates-five-years)
3 [releases/tcl-celebrates-five-years](https://www.tclusa.com/about-us/press-releases/tcl-celebrates-five-years); <https://www.tclusa.com/products>.

4 21. TCL Products can be purchased through retailers throughout the
5 United States including, without limitation, Best Buy, Target, Walmart, Costco, BJ
6 Wholesale, B&H and PC Richards & Sons.

7 22. On information and belief, as of 2019, TCL was the second largest
8 brand of smart televisions in the United States. [https://www.tclusa.com/about-](https://www.tclusa.com/about-us/press-releases/tcl-celebrates-five-years)
9 [us/press-releases/tcl-celebrates-five-years](https://www.tclusa.com/about-us/press-releases/tcl-celebrates-five-years).

10 23. TCL Products include modules (e.g., WCOHR2601) containing Wi-Fi
11 chips including, without limitation, Realtek RT8812BU (each a “TCL Chip”;
12 collectively, the “TCL Chips”). TCL Chips provide wireless connectivity for TCL
13 Products.

14 24. Below are images from a TCL television model no. 43S425 purchased
15 from Best Buy.



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