

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

PARKERVISION, INC.,  
*Plaintiff*

6-20-CV-00870

-v-

HISENSE CO., LTD., HISENSE  
VISUAL TECHNOLOGY CO., LTD.  
*Defendants*

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PARKERVISION, INC.,  
*Plaintiff*

6-20-CV-00945

-v-

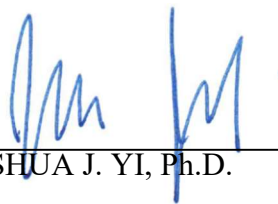
TCL INDUSTRIES HOLDINGS CO.,  
LTD., TCL ELECTRONICS  
HOLDINGS LTD., SHENZHEN TCL  
NEW TECHNOLOGY CO., LTD., TCL  
KING ELECTRICAL APPLIANCES  
(HUIZHOU) CO., LTD., TCL MOKA  
INT'L LTD., TCL MOKA  
MANUFACTURING S.A. DE C.V.  
*Defendants*

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**SPECIAL MASTER'S RECOMMENDED CLAIM CONSTRUCTIONS**

The undersigned held a *Markman* hearing on October 27, 2021, during which, the undersigned provided the constructions he planned to recommend to the court. The undersigned now formally enters those recommended claim constructions (“Recommendations”). The undersigned will, as soon as is practicable, enter a full Report and Recommendation explaining the basis for these Recommendations. The deadlines for the parties’ objections to the Recommendations are based on the entry of the full Report and Recommendation, and not these Recommendations.

**SIGNED** this 29th day of October, 2021.

A handwritten signature in blue ink, appearing to read "Joshua J. Yi", is written above a horizontal line.

JOSHUA J. YI, Ph.D.

**I. Level of ordinary skill in the art**

Plaintiff's Proposal	Defendants' Proposal	Special Master's Proposal
(i) a Bachelor of Science degree in electrical or computer engineering (or a related academic field), and at least two 2 additional years of experience in the design and development of radio frequency circuits and/or systems or (at least five 5 years of experience and training in the design and development of radio frequency circuits and/or systems	At least an undergraduate degree in electrical engineering or a related subject and two or more years of experience in the fields of communication systems, signal processing and/or RF circuit design Less work experience may be compensated by a higher level of education, such as a master's degree	A Bachelor of Science degree in electrical engineering (or an equivalent degree) and at least two additional years of experience in the design and development of radio frequency circuits and/or systems Less work experience may be compensated by a higher level of education, such as a master's degree.

**II. Disputed constructions**

Note: The Court previously construed the shaded terms in *ParkerVision v. Intel* (6-20-cv-00108 and 6-20-cv-00505).

Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Special Master's Recommendation
#1: "low impedance load"  U.S. Patent No. 9,246,736, Claims 26, 27; 9,444,673, Claim 5  Proposed by TCL	Plain and ordinary meaning	Indefinite	Not indefinite under the plain and ordinary meaning

Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Special Recommendation
<p>#2: "said energy discharged from said capacitor provides sufficient power to drive the low impedance load"</p> <p>U.S. Patent No. 9,444,673, Claim 5</p> <p>Proposed by TCL</p>	<p>Plain and ordinary meaning</p>	<p>Indefinite</p>	<p>Not indefinite under ordinary meaning</p>

Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Special Master's Recommended Construction
<p>#3: "Storage" terms</p> <p>U.S. Patent No. 6,049,706, Claims 105, 114, 115, 164, 166, 168, 175, 179, 186, 190; U.S. Patent No. 6,580,902, Claim 1; U.S. Patent No. 7,110,444, Claim 3; U.S. Patent No. 7,292,835, Claims 1, 18, 20; U.S. Patent No. 8,588,725, Claims 1, 6, 17, 18, 19; U.S. Patent No. 8,660,513, Claim 19; U.S. Patent No. 9,118,528, Claims 1, 9; U.S. Patent No. 9,246,736, Claims 1, 11, 21, 26, 27; U.S. Patent No. 9,444,673, Claims 13, 17, 18</p> <p>Proposed by ParkerVision</p>	<p>Energy storage element / storage element: "an element of an energy transfer system that stores nonnegligible amounts of energy from an input electromagnetic signal for driving a low impedance load."</p> <p>Energy storage module / storage module: "a module of an energy transfer system that stores nonnegligible amounts of energy from an input electromagnetic signal for driving a low impedance load."</p> <p>Energy storage device: "a device of an energy transfer system that stores nonnegligible amounts of energy from an input electromagnetic signal for driving a low impedance load."</p>	<p>"an apparatus that stores non-negligible amounts of energy from the carrier signal."</p> <p>(all terms are indefinite under ParkerVision's proposed constructions)</p>	<p>Energy storage element / storage element: "an element of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal for driving a low impedance load."</p> <p>Energy storage module / storage module: "a module of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal for driving a low impedance load."</p> <p>Energy storage device: "a device of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal for driving a low impedance load."</p>

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