

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PARKERVISION, INC.,

Patent Owner.

Case IPR2022-00245

U.S. Patent No. 7,110,444

MOTION FOR JOINDER TO *INTER PARTES* REVIEW IPR2021-00990

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I. STATEMENT OF THE PRECISE RELIEF REQUESTED

LG Electronics Inc. (“Petitioner” or “LGE”) respectfully submits this Motion for Joinder, concurrently with a Petition (“the LGE Petition”) for *inter partes* review of U.S. Patent No. 7,110,444 (“the ’444 Patent”) filed herewith.

Pursuant to 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22 and 42.122(b), LGE requests that this proceeding be joined with a pending *inter partes* review proceeding initiated by TCL Industries Holdings Co., Ltd. (“TCL”) and Hisense Co., Ltd. (“Hisense”) (collectively “the TCL Petitioners”), the petitioners in *TCL Industries Holdings Co. v. ParkerVision, Inc.*, IPR2021-00990 (“the TCL IPR”). The Board instituted the TCL IPR on November 22, 2021, concerning the same claims of the ’444 Patent at issue in the LGE Petition. This request is being submitted within the time set forth in 37 C.F.R. § 42.122(b).

LGE’s request for joinder is consistent with the policy surrounding *inter partes* reviews, as it is the most expedient way “to secure the just, speedy, and inexpensive resolution of every proceeding.” *See* 37 C.F.R. § 42.1(b); *see also* *HTC v. Parthenon Unified Memory Architecture LLC.*, IPR2017-00512, Paper No. 12 at 5-6 (June 1, 2017). The LGE Petition and the TCL IPR are substantively identical; they contain the same grounds (based on the same prior art combinations and supporting evidence) against the same claims, consistent with PTAB joinder practice. Further, upon joining the TCL IPR, LGE will act as an “understudy” unless

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