

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.,

Petitioner,

v.

PARKERVISION, INC.,

Patent Owner.

Case IPR2022-00246

U.S. Patent No. 7,292,835

MOTION FOR JOINDER TO *INTER PARTES* REVIEW IPR2021-00985

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LGE's Motion for Joinder
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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. 7,292,835 (“the ’835 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”), Hisense Co., Ltd. (“Hisense”) and ZyXEL Communications Corp. (“ZyXEL”)¹ (collectively “the TCL Petitioners”), the petitioners in *TCL Industries Holdings Co. v. ParkerVision, Inc.*, IPR2021-00985 (“the TCL IPR”). The Board instituted the TCL IPR on November 19, 2021, concerning the same claims of the ’835 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;

¹ On October 7, 2021, the Board terminated ZyXEL as a Petitioner in the TCL IPR. *See* Paper 13 in IPR2021-00985.

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