

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,

Plaintiff,

v.

**MEDIATEK INC. and
MEDIATEK USA INC.**

Defendants.

Case No. 6:22-cv-01163

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff ParkerVision, Inc. (“ParkerVision”), by and through its undersigned counsel, files this Complaint against Defendants MediaTek Inc. and MediaTek USA Inc. (collectively, “MediaTek” or “Defendants”) for patent infringement of United States Patent Nos. 6,049,706; 6,266,518; 7,292,835; and 8,660,513 (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 4446-1A Hendricks Avenue, Suite 354, Jacksonville, Florida 32207.

3. On information and belief, MediaTek Inc. is a foreign corporation organized and existing under the laws of Taiwan with a principal place of business located at No. 1, Dusing Road 1, Hsinchu Science Park, Hsinchu City 30078, Taiwan.

4. On information and belief, Defendant MediaTek USA Inc. is a corporation organized and existing under the laws of the state of Delaware with a place of business in the Western District of Texas, including at 5914 West Courtyard Drive, Suite 400, Austin, TX 78730. <https://corp.mediatek.com/about/office-locations/mediatek-usa-offices>. On information and belief, MediaTek USA Inc. is a subsidiary of MediaTek Inc.

5. MediaTek designs, develops, manufactures, and sells integrated circuits/wireless chips.

V. Business Activities

1. Business Scope

1.1. Business Scope

1.1.1 The Main Business Activities of the Company

- A. Design, develop, produce, manufacture and market the following products:
 - a. Multimedia Integrated Circuits (IC);
 - b. Computer peripheral ICs;
 - c. High-end digital consumer ICs;
 - d. Other application specific ICs;
 - e. Patent and circuit-layout licensing and services of the above-mentioned products
- B. Provide the above-mentioned products with software and hardware application design, test, maintenance, and technological consultation services
- C. Import and export of the above-mentioned products

https://cdn-www.mediatek.com/posts/2021-English-Annual-Report_Final.pdf at page 64.

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. MediaTek 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 MediaTek because MediaTek 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 MediaTek because, *inter alia*, MediaTek, 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. MediaTek 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 MediaTek because MediaTek (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, MediaTek (or those acting on its behalf) uses, sells, offers for sale, imports, advertises, and/or otherwise promotes infringing products (receiver, transmitter, and/or transceiver integrated circuits (e.g., chips for use in wireless devices)) in the United States, the State of Texas, and this judicial district. The infringing products include, without limitation, the MediaTek MT7612UN (“MediaTek Chips”).

11. On information and belief, MediaTek has a regular and established place of business within the Western District of Texas, including 5914 West Courtyard Drive, Suite 400, Austin, TX 78730. On information and belief, MediaTek has physical facilities and employees in

this judicial district. On information and belief, MediaTek maintains additional offices and employees in Texas including at 825 Watters Creek Blvd, Suite 265, Allen, TX 75103.

12. This case is related to at least the following cases before this Court and involves common patents and products: *ParkerVision, Inc. v. Hisense Co., Ltd. et al.*, 6-20-CV-00870 (W.D. Tex.) and *ParkerVision, Inc. v. LG Electronics, Inc.*, 6:21-CV-00520 (W.D. Tex.).

13. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b)-(d) and/or 1400(b) at least because MediaTek Inc. is a foreign corporation subject to personal jurisdiction in this judicial district and has committed acts of infringement within this judicial district giving rise to this action.

PARKERVISION

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

19. 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.

20. 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.

THE ASSERTED PATENTS

United States Patent No. 6,049,706

21. On April 11, 2000, the United States Patent and Trademark Office duly and legally issued United States Patent No. 6,049,706 ("the '706 patent") entitled "Integrated Frequency Translation and Selectivity" to inventor Robert W. Cook et al.

22. The '706 patent is presumed valid under 35 U.S.C. § 282.

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