

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

PARKERVISION, INC.,

Plaintiff,

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., and  
TCL MOKA MANUFACTURING S.A. DE  
C.V.,

Defendants.

Case No. 6:20-cv-00945-ADA

JURY TRIAL DEMANDED

CASE READINESS STATUS REPORT

Plaintiff ParkerVision, Inc. and Defendants 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., and TCL Moka Manufacturing S.A. DE C.V. hereby provide the following status report in advance of the initial Case Management Conference (CMC).

FILINGS AND EXTENSIONS

Plaintiff's Complaint was filed on October 12, 2020. There has been one extension for thirty-one (31) days.

### RESPONSE TO THE COMPLAINT

Defendants responded to the Complaint on February 8, 2021 by filing their Answer. *See* Dkt. No. 16.

### PENDING MOTIONS

There are no pending motions.

### RELATED CASES IN THIS JUDICIAL DISTRICT

There are five (5) related cases in the Judicial District, all of which assert one or more of the same patents asserted in this case. *See ParkerVision, Inc. v. Intel Corporation*, Case No. 6:20-cv-108-ADA, *ParkerVision, Inc. v. Intel Corporation*, Case No. 6:20-cv-562-ADA, *ParkerVision, Inc. v. Hisense Co., Ltd. et al.*, Case No. 6:20-cv-870-ADA, *ParkerVision, Inc. v. Buffalo Inc.*, Case No. 6:20-cv-1009-ADA, and *ParkerVision, Inc. v. ZyXEL Communications Corporation*, Case No. 6:20-cv-1010-ADA.

### IPR, CBM, AND OTHER PGR FILINGS

IPR2020-01265, related to U.S. Patent No. 7,110,444, was filed on July 13, 2020 by Intel Corporation and docketed on August 21, 2020. A Final Written decision is expected on or before January 28, 2022. Other than IPR2020-01265, there are no known IPR, CBM or other PGR filings.

### NUMBER OF ASSERTED PATENTS AND CLAIMS

Plaintiff has asserted ten (10) patents, namely, U.S. Pat. Nos. 6,049,706 (“706 patent”); 6,266,518 (“518 patent”); 6,580,902 (“902 patent”); 7,110,444 (“444 patent”); 7,292,835 (“835 patent”); 8,588,725 (“725 patent”); 8,660,513 (“513 patent”); 9,118,528 (“528 patent”); 9,246,736 (“736 patent”) and 9,444,673 (“673 patent”). Plaintiff has not

yet served its Preliminary Infringement Contentions (PICs) and will identify the claims to be asserted in its PICs. The parties agree as follows:

- On or before March 17, 2021, Plaintiff shall serve a list of all asserted claims for each asserted patent.
- On or before March 17, 2021, Plaintiff shall serve claim charts for one asserted claim for each asserted patent;
- On or before March 26, 2021, Plaintiff shall serve any additional claim charts not previously served, along with all associated documents under the Court's local rules and standing orders. Any and all claim charts served on or before March 26, 2021, shall match the list of asserted claims served by Plaintiff on March 17, 2021.
- On or before June 4, 2021, Defendants shall serve their invalidity contentions, along with the associated documents under the Court's local rules and standing orders.

#### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties do not request the appointment of any technical advisor at this time, but the Parties do not oppose the appointment of a technical advisor should the Court deem it appropriate or helpful to the Court.

#### **MEET AND CONFER STATUS**

Plaintiff and Defendant conducted a meet and confer conference on March 1, 2021. The parties have no pre-*Markman* issues to raise at the CMC.

Dated: March 8, 2021

Respectfully submitted,

OF COUNSEL:

Ronald M. Daignault\*  
Chandran B. Iyer\*  
Jason S. Charkow\*  
Stephanie R. Mandir\*  
DAIGNAULT IYER LLP  
[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)  
[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)  
[jcharkow@daignaultiyer.com](mailto:jcharkow@daignaultiyer.com)  
[smandir@daignaultiyer.com](mailto:smandir@daignaultiyer.com)  
8200 Greensboro Drive, Suite 900  
McLean, Virginia 22102

/s/ Raymond W. Mort, III  
Raymond W. Mort, III  
Texas State Bar No. 00791308  
[raymort@austinlaw.com](mailto:raymort@austinlaw.com)  
THE MORT LAW FIRM, PLLC  
100 Congress Avenue, Suite 2000  
Austin, Texas 78701  
Tel/Fax: 512-865-7950

Attorneys for Plaintiff *ParkerVision, Inc.*

*\*pro hac vice to be filed*

KILPATRICK TOWNSEND & STOCKTON  
LLP

By: /s/Steve R. Borgman  
Steve R. Borgman (State Bar No. 02670300)  
[sborgman@kilpatricktownsend.com](mailto:sborgman@kilpatricktownsend.com)  
Suite 4300, 700 Louisiana Street  
Houston, TX 77002  
Telephone: (281) 809-4081  
Facsimile: (281) 990-6826

Kristopher L. Reed  
[kreed@kilpatricktownsend.com](mailto:kreed@kilpatricktownsend.com)  
Kevin M. Bell  
[kbell@kilpatricktownsend.com](mailto:kbell@kilpatricktownsend.com)  
Edward J. Mayle  
[tmayle@kilpatricktownsend.com](mailto:tmayle@kilpatricktownsend.com)  
Suite 600, 1400 Wewatta Street  
Denver, CO 80202  
Telephone: (303) 571-4000  
Facsimile: (303) 571-4321

Steven D. Moore  
[smore@kilpatricktownsend.com](mailto:smore@kilpatricktownsend.com)  
Two Embarcadero Center, Suite 1900  
San Francisco, CA 94111  
Telephone: (415) 576-0200  
Facsimile: (415) 576-0300

Megan Chung  
[mchung@kilpatricktownsend.com](mailto:mchung@kilpatricktownsend.com)  
12255 El Camino Real, Ste. 250  
San Diego, CA 92130  
Telephone: (858) 350-6144  
Facsimile: (858) 430-3851

Attorneys for Defendants