

UNITED STATES DISTRICT COURT
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

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO SUBSTITUTE EXHIBITS 17 AND 18 TO
DEFENDANTS' OPENING CLAIM CONSTRUCTION BRIEF**

Defendants TCL Industries Holdings Co., 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. (collectively, “TCL” or “Defendants”), hereby move to substitute Exhibit 17 (Attachment 33-18) and Exhibit 18 (Attachment 33-19) to Defendants’ Opening Claim Construction Brief (Dkt. 33) with the attached corrected Exhibit 17 (Attachment 33-18) and corrected Exhibit 18 (Attachment 33-19).

DATED: September 14, 2021

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By: /s/ Kristopher L. Reed

Kristopher L. Reed (*pro hac vice*)

kreed@kilpatricktownsend.com

Kevin M. Bell (*pro hac vice*)

kbell@kilpatricktownsend.com

Edward J. Mayle (*pro hac vice*)

tmayle@kilpatricktownsend.com

Suite 600, 1400 Wewatta Street

Denver, CO 80202

Telephone: (303) 571-4000

Facsimile: (303) 571-4321

Steve R. Borgman

sborgman@kilpatricktownsend.com

Suite 4300, 700 Louisiana Street

Houston, TX 77002

Telephone: (281) 809-4081

Facsimile: (281) 990-6826

Steven D. Moore (*pro hac vice*)

smoore@kilpatricktownsend.com

Two Embarcadero Center, Suite 1900

San Francisco, CA 94111

Telephone: (415) 576-0200

Facsimile: (415) 576-0300

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on September 14, 2021, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(b).

/s/ Edward J. Mayle

Edward J. Mayle

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that Edward J. Mayle, counsel for Defendants, conferred with Ronald Daignault, counsel for Plaintiff, on September 12, 2021 regarding this Motion, and Plaintiff does not oppose this Motion.

/s/ Edward J. Mayle

Edward J. Mayle