## 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

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).

<u>/s/ Edward J. Mayle</u> 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

