

**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.;

HISENSE CO., LTD. and HISENSE
VISUAL TECHNOLOGY CO., LTD. (F/K/A
QINGDAO HISENSE ELECTRONICS CO.),
LTD. and HISENSE ELECTRIC CO., LTD.

Defendants.

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

Case No. 6:20-cv-00870-ADA

JURY TRIAL DEMANDED

**DECLARATION OF EDWARD J. MAYLE IN SUPPORT OF
DEFENDANTS' OPENING CLAIM CONSTRUCTION BRIEF**

I Edward J. Mayle, upon personal knowledge or information and belief, state as follows:

1. I am a lawyer with Kilpatrick Townsend & Stockton LLP, and am counsel for 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 Moka Manufacturing S.A. De C.V. (collectively "TCL") in Case No. 6:20-cv-00945-ADA, and am counsel for Hisense Co., Ltd. and Hisense Visual Technology Co., Ltd. (f/k/a Qingdao Hisense Electronics Co., Ltd. and Hisense Electric Co., Ltd.) (collectively "Hisense") in Case No. 6:20-cv-00870-ADA. I am admitted to the bars of Colorado and the District of Columbia, and admitted in both of the above-referenced cases *pro hac vice*. I am over the age of 18 and otherwise competent to make this declaration.

2. I make this declaration on my own knowledge, except where otherwise noted. If called upon to testify regarding the contents of this declaration, I could and would completely testify to its accuracy.

3. Attached as **Exhibit 1** is a true and correct copy of Patent Owner's Response to Petition in Case IPR2014-00946 (PTAB) dated March 19, 2015.

4. I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on October 4, 2021, in Denver Colorado

/s/ Edward J. Mayle
Edward J. Mayle