

EXHIBIT 11

From: William Melsheimer <William_Melsheimer@txwd.uscourts.gov>
Sent: Thursday, February 17, 2022 12:43 PM
To: Nicole Winningham
Cc: jcharkow@daignaultiyer.com; smandir@daignaultiyer.com; Chandran Iyer; Ron Daignault; Cathy Pampinella; Christian Samay; 'raymort@austinlaw.com'; LG-ParkerVision; melissa@gillamsmithlaw.com; gil@gillamsmithlaw.com
Subject: RE: Case 6:21-cv-00520-ADA ParkerVision, Inc. v. LG Electronics Inc.

[EXTERNAL]

Counsel:

The Court approves the request for the parties to collectively brief 30 terms. Please be sure to indicate in the claim construction briefs or in the joint claim construction statement that the Court approved this request, and that 28 of the terms have been previously argued in other cases.

Thanks,
Jeff Melsheimer



Jeff Melsheimer
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From: Nicole Winningham <nicole@gillamsmithlaw.com>
Sent: Thursday, February 17, 2022 11:17 AM
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Subject: Case 6:21-cv-00520-ADA ParkerVision, Inc. v. LG Electronics Inc.

CAUTION - EXTERNAL:

Pursuant to the Standing Order Governing Proceedings – Patent Cases (November 17, 2021) and the Parties' Agreed Scheduling Order (Dkt. No. 18), Defendant LG Electronics Inc. ("LGE") respectfully requests leave for the parties to collectively brief 30 terms, 6 terms in excess of the Court's presumptive 24-term limit (12-term limit per side).

ParkerVision Inc. ("ParkerVision") has asserted ten patents. In an effort to streamline the *Markman* proceedings, the parties have agreed to rely upon existing briefing from other cases pending before this Court concerning identical claim terms within the same Asserted Patents. Specifically, for 28 of the 30 total terms proposed for construction, the parties

will incorporate by reference and rely upon the same constructions, arguments, and positions previously presented to and considered by this Court in *ParkerVision, Inc. v. Intel Corp.*, No. 6:20-cv-00108-ADA (W.D. Tex.); *ParkerVision, Inc. v. Intel Corp.*, No. 6:20-cv-00562-ADA (W.D. Tex.); *ParkerVision, Inc. v. TCL Indus. Holdings Co.*, No. 6:20-cv-00945-ADA (W.D. Tex.); and/or *ParkerVision, Inc. v. Hisense Co.*, No. 6:20-cv-00870-ADA (W.D. Tex.) (collectively, the “Prior Litigations”).

The 28 terms for which the parties will incorporate the positions from the Prior Litigations are identified in the attached table. For each of these 28 terms, LGE’s and ParkerVision’s opening briefs will identify the portions of the briefs from the Prior Litigations that each party is seeking to incorporate by reference, attaching those briefs as exhibits for the Court’s convenience. Thus, under the parties’ proposal, there will be no new arguments or evidence for the Court to consider for these 28 terms. Only two disputed terms will be argued anew by LGE and/or ParkerVision. Additionally, where the parties reached agreement on the constructions of particular terms in the Prior Litigations, the parties agree to adopt such constructions in this case.

LGE therefore requests permission to construe a total of 30 disputed claim terms, two of which will be newly argued by the parties, with the parties otherwise incorporating by reference and relying upon briefing from the Prior Litigations for the remaining 28 disputed claim terms.

The parties have met and conferred regarding this request, and ParkerVision does not oppose LGE’s request.

Thank you,

Nicole Winningham
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