

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

PARKERVISION, INC.,

Plaintiff,

v.

LG ELECTRONICS, INC.,

Defendant.

Case No. 6:21-cv-00520-ADA

JURY TRIAL DEMANDED

DEFENDANT'S REPLY CLAIM CONSTRUCTION BRIEF

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TABLE OF ABBREVIATIONS AND EXHIBITS

Exhibit	Abbreviation	Description
	LGE	LG Electronics Inc.
	ParkerVision	ParkerVision, Inc.
1	'706 patent	U.S. Patent No. 6,049,706 to Cook et al.
2	'518 patent	U.S. Patent No. 6,266,518 to Sorrells et al.
3	'902 patent	U.S. Patent No. 6,580,902 to Sorrells et al.
4	'444 patent	U.S. Patent No. 7,110,444 to Sorrells et al.
5	'835 patent	U.S. Patent No. 7,292,835 to Sorrells et al.
6	'725 patent	U.S. Patent No. 8,588,725 to Sorrells et al.
7	'513 patent	U.S. Patent No. 8,660,513 to Sorrells et al.
8	'528 patent	U.S. Patent No. 9,118,528 to Sorrells et al.
9	'736 patent	U.S. Patent No. 9,246,736 to Sorrells et al.
10	'673 patent	U.S. Patent No. 9,444,673 to Sorrells et al.
	Asserted Patents	The '706, '518, '902, '444, '835, '725, '513, '528, '736, '673 patents
11	Court's Permission	February 17, 2022 Email from Jeff Melsheimer, Law Clerk to the Honorable Alan D. Albright
12	Intel 108 CC Or.	Claim Construction Order in <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00108, Dkt. No. 75 (W.D. Tex. Jan. 26, 2021)
13	Intel 562 CC Or.	Amended Claim Construction Order, <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 66 (W.D. Tex. Oct. 22, 2021)
14	TCL/Hisense Special Master's Rec. CC	Special Master's Recommended Claim Constructions, <i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 51 (W.D. Tex. Oct. 29, 2021); Special Master's Recommended Claim Constructions, <i>ParkerVision, Inc. v. TCL Indus. Holdings Co.</i> , No. 6:20-cv-00945, Dkt. No. 49 (W.D. Tex. Oct. 29, 2021)
15	'444 FWD	Final Written Decision, <i>Intel Corp. v. ParkerVision, Inc.</i> , IPR2020-01265, Pap. 44 (P.T.A.B. Jan. 21, 2022)
16	IPR2014-00948 POPR	Patent Owner Preliminary Response, <i>Farmwald v. ParkerVision, Inc.</i> , IPR2014-00948, Pap. 7 (P.T.A.B. Sept. 24, 2014)
17	'551 patent	U.S. Patent No. 6,061,551 to Sorrells et al.
18	'371 patent	U.S. Patent No. 6,370,371 to Sorrells et al.
19	TCL/Hisense Op. Br.	Defendants' Opening Claim Construction Brief, <i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34 (W.D. Tex. Aug. 23, 2021)
19-1		Declaration of Edward J. Mayle in Support of Defendants' Opening Claim Construction Brief (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-1)
19-2		Exhibit 1 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-2)

Exhibit	Abbreviation	Description
19-3		Exhibit 2 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-3)
19-4		Exhibit 3 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-4)
19-5		Exhibit 4 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-5)
19-6		Exhibit 5 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-6)
19-7		Exhibit 6 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-7)
19-8		Exhibit 7 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-8)
19-9		Exhibit 8 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-9)
19-10		Exhibit 9 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-10)
19-11		Exhibit 10 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-11)
19-12		Exhibit 11 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-12)
19-13		Exhibit 12 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-13)
19-14		Exhibit 13 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-14)
19-15		Exhibit 14 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-15)
19-16		Exhibit 15 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-16)
19-17		Exhibit 16 to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-17)
19-18		Exhibit 17 (Corrected) to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 36-1)
19-19		Exhibit 18 (Corrected) to TCL/Hisense Op. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 36-2)
19-20		Declaration of Matthew Shoemake B. Shoemake in Support of Defendants' Opening Claim Construction Brief (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-20)
19-21		Appendix 1 to Declaration of Matthew Shoemake B. Shoemake in Support of Defendants' Opening Claim Construction Brief (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-21)

Exhibit	Abbreviation	Description
19-22		Appendix 2 to Declaration of Matthew Shoemake B. Shoemake in Support of Defendants' Opening Claim Construction Brief (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-22)
19-23		Appendix 3 to Declaration of Matthew Shoemake B. Shoemake in Support of Defendants' Opening Claim Construction Brief (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 34-23)
20	TCL/Hisense Rep. Br.	Defendants' Reply Claim Construction Brief, <i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 42 (W.D. Tex. Oct. 4, 2021)
20-1		Declaration of Edward J. Mayle in Support of Defendants' Reply Claim Construction Brief (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 42-1)
20-2		Exhibit 1 to TCL/Hisense Rep. Br. (<i>ParkerVision, Inc. v. Hisense Co.</i> , No. 6:20-cv-00870, Dkt. No. 42-2)
21	Intel 562 Resp. Br.	Intel Corporation's Responsive Claim Construction Brief in <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41 (W.D. Tex. Apr. 2, 2021)
21-1		Declaration of Marissa A. Lalli in Support of Defendant Intel Corporation's Opening Claim Construction Brief (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-1)
21-2		Exhibit 1 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-2)
21-3		Exhibit 2 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-3)
21-4		Exhibit 3 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-4)
21-5		Exhibit 4 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-5)
21-6		Exhibit 5 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-6)
21-7		Exhibit 6 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-7)
21-8		Exhibit 7 to Intel 562 Resp. Br. (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-8)
21-9		Declaration of Dr. Daniel W. van der Weide in Support of Intel Corporation's Responsive Claim Construction Brief (<i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 41-9)
22	Intel 562 Rep. Br.	Intel Corporation's Reply Claim Construction Brief, <i>ParkerVision, Inc. v. Intel Corp.</i> , No. 6:20-cv-00562, Dkt. No. 44 (W.D. Tex. May 12, 2021)



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