

EXHIBIT 32-7

EXHIBIT 6

Petitioner's Reply to Patent Owner's Response
IPR2020-01302 (U.S. Patent No. 7,539,474)

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intel Corporation
Petitioner

v.

ParkerVision, Inc.
Patent Owner

Case No. IPR2020-01302
U.S. Patent No. 7,539,474

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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Petitioner's Reply to Patent Owner's Response
IPR2020-01302 (U.S. Patent No. 7,539,474)**I. INTRODUCTION**

Patent Owner (“PO”) contends that the cited references do not invalidate claims 1, 3, 4, 7, and 9-11 (the “remaining claims”) because they do not teach sampling.¹ Specifically, to overcome the cited references, PO repeatedly and unequivocally states that the remaining claims require a particular form of down-conversion by sampling. (POR, 2 (“[T]he ’474 patent pertains to a technique called *sampling*”); *id.* (“[A]ll of the challenged claims are directed to a *sampling* system and, in particular, an *energy sampling* system”); *id.*, 20 (“The challenged claims only cover energy sampling”); *id.*, 22 (“In seeking to develop a solution for down-converting an RF signal, however, ParkerVision took a different approach and focused on energy *sampling* instead of mixing. Energy sampling (also known as energy transfer) was/is a *fundamentally different and competing method* to mixing. Energy samplers, unlike mixers, do not mix (i.e., multiply) two signals together in order to down-convert a signal.”); *id.*, 38 (“The ’551 patent and, thus, the ’474 patent discloses two systems for down-conversion: (1) *energy* transfer (i.e., *energy* sampling) and (2) sample and hold (i.e., *voltage* sampling).”) (emphasis in original).)

¹ PO provides no argument for why claim 12 is valid, instead stating that it will disclaim claim 12. (POR, 1.) Petitioner requests that the Board find claim 12 invalid.



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