EXHIBIT 32-7



EXHIBIT 6



Casse 66 201-cov-00015080-ANDAA Doocumeentt 1317-87 FFileed 008/801/222 Pragge 32 off 440

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 BOARI
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



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

TABLE OF CONTENTS

I.	INTRODUCTION		
II.	CLAIM CONSTRUCTION		3
	A.	PO's Proposed "Storage Element" Construction Should Be Rejected	3
	В.	PO's Remaining Claim Construction Arguments are Irrelevant and Wrong	8
III.	THE INVALIDITY OF CLAIM 12 IS UNCONTESTED		
IV.	ASSUMING THE REMAINING CLAIMS REQUIRE SAMPLING, LARSON AND BUTLER DO NOT INVALIDATE THEM		9
V.	IF THE CLAIMS DO NOT REQUIRE SAMPLING, THE CLAIMS ARE INVALID OVER LARSON AND BUTLER		
	A.	Larson and Butler each disclose "switch[es]"	14
	В.	Larson discloses "storage element[s]."	22
	C.	Butler discloses "pulse[s]"	24
	D.	Larson and Butler each disclose "low pass filter[s]"	26
	Е.	A POSITA would have been motivated to combine Larson and Butler	28
VI.	SECONDARY CONSIDERATIONS		30
VII.	CONCLUSION		



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 downconversion 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.

DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

