

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,

Plaintiff,

v.

LG ELECTRONICS, INC.,

Defendant.

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

JURY TRIAL DEMANDED

**PLAINTIFF PARKERVISION, INC.'S
SUR-REPLY CLAIM CONSTRUCTION BRIEF**

TABLE OF CONTENTS

	<u>Page</u>
I. Storage Terms	1
II. Cable Modem.....	6

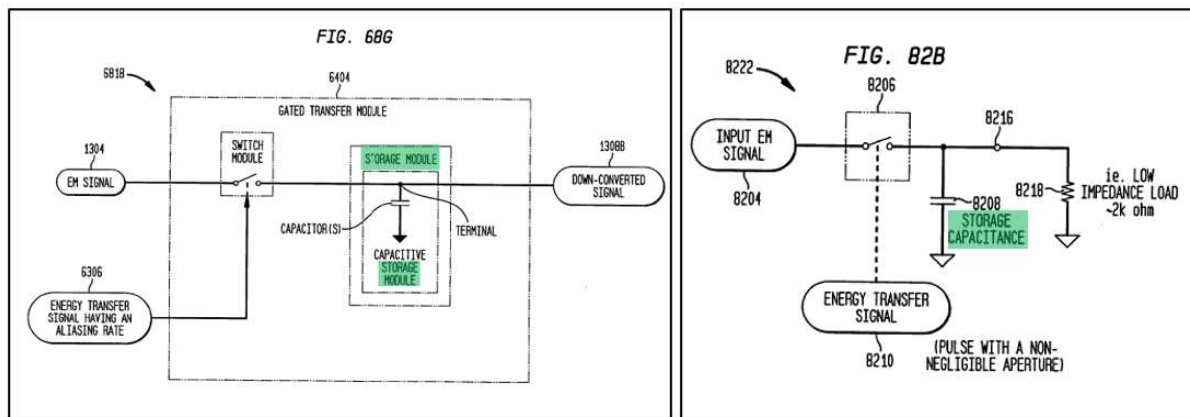
TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Aug. Tech. Corp. v. Camtek, Ltd.</i> , 655 F.3d 1278 (Fed. Cir. 2011).....	7
<i>Baxalta Inc. v. Genentech, Inc.</i> , 972 F.3d 1341 (Fed. Cir. 2020).....	5
<i>C.W. Zumbiel Co. v. Kappos</i> , 702 F.3d 1371 (Fed. Cir. 2012)	6
<i>Deere & Co. v. Bush Hog</i> , LLC, 703 F.3d 1349 (Fed. Cir. 2012).....	8
<i>Poly-Am., L.P. v. GSE Lining Tech., Inc.</i> , 383 F.3d 1303 (Fed. Cir. 2004).....	7

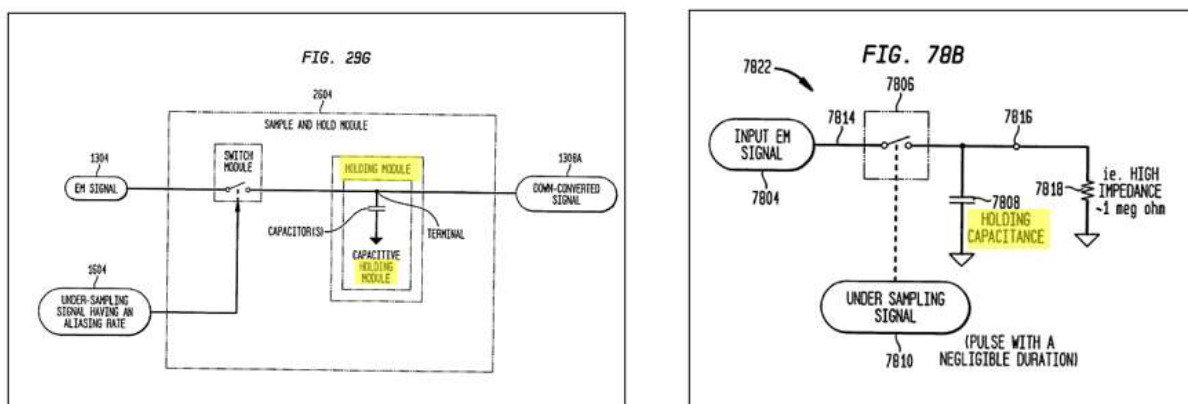
I. Storage Terms

In its reply brief, LG merely repeats arguments from its opening brief – the *same* flawed arguments that this Court already considered and rejected *three* times in ParkerVision’s litigations against Intel, TCL and Hisense. Tellingly, LG provides *no substantive* (technical) arguments based on the intrinsic evidence as to why including “an [element/ module/device] of an energy transfer system” is wrong. It is not. And LG has no response to this.

So, LG has chosen to *ignore* the significant intrinsic evidence that contradicts LG’s position. For example, in its reply brief, LG has no response to the fact that the specification distinguishes between a “storage” module/capacitance used in an energy transfer system as shown in Figures 68G, 82B (below) and a “holding” module/capacitance used in a sample/hold (voltage sampling) system as shown in Figures 29G, 78B (below). *See* D.I. 36 (“PV Resp. Br.”) at 4-5.



Energy transfer system



Sample and hold system

LG also ignores the specification's other disclosures distinguishing between energy transfer systems and sample/hold systems. *See, e.g.,* '518 patent, 53:24-58:29 (discussing sample/hold systems); 65:56 – 67:39, 97:14-101:67 (discussing energy transfer systems).

With nothing to rely on, LG's *sole* focus is a *single* sentence (in blue below) from the specification. Similar to all other defendants before it, LG asserts that this sentence is lexicography for "storage" element/module/device. It is not. *See* PV Resp. Br. at 6.

FIG. 82A illustrates an exemplary *energy transfer system* 8202 for down-converting an input EM signal 8204. The *energy transfer system* 8202 includes a switching module 8206 and a *storage module* illustrated as a *storage capacitance* 8208. The terms *storage module* and *storage capacitance*, as used herein, are *distinguishable* from the terms *holding module* and *holding capacitance*, respectively. *Holding modules* and *holding capacitances*, as used above, *identify systems* that store negligible amounts of energy from an under-sampled input EM signal with the *intent of 'holding' a voltage value*. *Storage modules and storage capacitances, on the other hand, refer to systems* that store non-negligible amounts of energy from an input EM signal.

Id., 66:12-23.¹

Indeed, LG's own construction of the "storage" terms demonstrates that not even LG believes that the blue sentence (which LG asserts is a "explicit definition") is lexicography.

¹ Unless otherwise noted, all emphasis has been added.

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