

**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**

**JOINT CLAIM CONSTRUCTION STATEMENT**

## I. TERMS THAT THE PARTIES NEWLY BRIEFED IN THIS LITIGATION

Term No.	Term	ParkerVision's Proposed Construction	LGE's Proposed Construction
1	<p>"storage module" ( '706 patent, cls. 105, 114, 115, 164, 166, 168, 175, 179, 186, 190; '835 patent, cls. 1, 18; '725 patent, cls. 1, 6, 17-19) "energy storage module" ( '902 patent, cl. 1) "storage element" ( '444 patent, cls. 3, 4) "storage device" ( '835 patent, cl. 20) "energy storage element" ( '513 patent, cl. 19; '528 patent, cls. 1, 9; '736 patent, cls. 1, 11, 21, 26, 27) "energy storage device" ( '673 patent, cls. 13, 17, 18)</p>	<p><b>Energy storage element / storage element:</b> "an element of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal"   <b>Energy storage module / storage module:</b> "a module of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal"   <b>Energy storage device:</b> "a device of an energy transfer system that stores non-negligible amounts of energy from an input electromagnetic signal"</p>	<p>"a module that stores a non-negligible amount of energy from an input electromagnetic (EM) signal"</p>
2	<p>"A cable modem for down-converting an electromagnetic signal having complex modulations, comprising" ( '835 patent, cl. 1)</p>	<p>The entire preamble (including "cable modem") is limiting.</p>	<p>Only the portion of the preamble reciting "an electromagnetic signal having complex modulations" is limiting.</p>

## II. TERMS WITH BRIEFING IN PRIOR LITIGATIONS INCORPORATED BY REFERENCE

Term No.	Term	ParkerVision's Proposed Construction and Citation(s) to Incorporated By Reference Arguments from Prior Litigations	LGE's Proposed Construction and Citation(s) to Incorporated By Reference Arguments from Prior Litigations
3	<p>“said input sample” (’706 patent, cls. 1, 6, 7)</p> <p>“said sample” (’706 patent, cl. 34)</p>	<p><i>Plain and ordinary meaning</i></p> <p><b>Citation(s):</b> Dkt. No. 36-8: PV 562 Op. Br. at 9-10, § V.B; Dkt. No. 36-13: PV 562 Rep. Br. at 12-13, § IV.C</p>	<p>“the sample of the image that has been down-converted”</p> <p><b>Citation(s):</b> Dkt. No. 32-45: Intel 562 Resp. Br. at 7, § II.B; Dkt. No. 32-55: Intel 562 Rep. Br. at 7-8, § II.B</p>
4	<p>“under-sample” / “under-samples” / “under-sampling” (’706 patent, cls. 1, 6, 7, 28, 34; ’444 patent, cl. 2)</p>	<p>“sampling at an aliasing rate” or “sampling at less than or equal to twice the frequency of the input signal”</p> <p><b>Citation(s):</b> Dkt. No. 36-1: PV 108 Op. Br. at 27-28, § IV.G; Dkt. No. 36-5: PV 108 Resp. Br. at 2-4, § II; 20-23, § III.G; Dkt. No. 36-6: PV 108 Rep. Br. at 3, § III; 16-17, § V.G; Dkt. No. 36-16: PV 870/945 Resp. Br. at 33-34, § IV.N</p>	<p>“sampling at less than or equal to twice the frequency of the input signal”</p> <p><b>Citation(s):</b> Dkt. No. 33: Intel 108 Op. Br. at 19-24, § IV.B; Dkt. No. 32-90: Intel 108 Resp. Br. at 2-5, § II; 18-22, § III.B; Dkt. No. 32-97: Intel 108 Rep. Br. at 1-3, § II; 6-9, § III.B; Dkt. No. 32-18: TCL/Hisense Op. Br. at 31, § II.N; Dkt. No. 32-42: TCL/Hisense Rep. Br. at 15, § I.I</p>
5	<p>“harmonic” / “harmonics” (’706 patent, cls. 1, 6, 7, 28, 34; ’518 patent, cl. 1)</p>	<p><b>Harmonic:</b> “A sinusoidal component of a periodic wave that has a frequency that is an integer multiple of the fundamental frequency of the periodic waveform and including the fundamental frequency as the first harmonic”</p>	<p><b>Harmonic:</b> “A sinusoidal component of a periodic wave that has a frequency that is an integer multiple of the fundamental frequency of the periodic wave”</p>

		<p><b>Harmonics:</b> “A frequency or tone that, when compared to its fundamental or reference frequency or tone, is an integer multiple of it and including the fundamental frequency as the first harmonic”</p> <p><b>Citation(s):</b> Dkt. No. 36-8: PV 562 Op. Br. at 12-17, § V.D; Dkt. No. 36-13: PV 562 Rep. Br. at 7-8, § III; 15-17, § IV.E Dkt. No. 36-16: PV 870/945 Resp. Br. at 34-36, § IV.O; Dkt. No. 36-22: PV 870/945 Sur-Rep. Br. at 14, § VIII</p>	<p><b>Harmonics:</b> “Sinusoidal components of a periodic wave each of which have a frequency that is an integer multiple of the fundamental frequency of the periodic wave”</p> <p><b>Citation(s):</b> Dkt. No. 32-45: Intel 562 Resp. Br. at 10-12, § II.D; Dkt. No. 32-55: Intel 562 Rep. Br. at 9-12, § II.D; Dkt. No. 32-18: TCL/Hisense Op. Br. at 31-32, § II.O; Dkt. No. 32-42: TCL/Hisense Rep. Br. at 15, § I.J</p>
6	<p>“integral filter/frequency translator to filter and down-convert an input signal” (’706 patent, cl. 28)</p>	<p><i>Plain and ordinary meaning</i> wherein the plain-and-ordinary meaning is “a circuit having a unified input filter and frequency translator.”</p> <p><b>Citation(s):</b> Dkt. No. 36-8: PV 562 Op. Br. at 30-33, § V.I; Dkt. No. 36-13: PV 562 Rep. Br. at 4-6, § II.B; 25-26, § IV.J Dkt. No. 36-16: PV 870/945 Resp. Br. at 36-37, § IV.P; Dkt. No. 36-22: PV 870/945 Sur-Rep. Br. at 14, § VII</p>	<p><i>Plain and ordinary meaning</i></p> <p><b>Citation(s):</b> Dkt. No. 32-18: TCL/Hisense Op. Br. at 32, § II.P; Dkt. No. 32-42: TCL/Hisense Rep. Br. at 14, § I.H</p>
7	<p>“modulated signal” (’706 patent, cl. 127) “modulated carrier signal” (’513 patent, cl. 19;</p>	<p>“an electromagnetic signal at a transmission frequency having at least one characteristic that has been modulated by a baseband signal”</p>	<p><i>Plain and ordinary meaning</i></p> <p><b>Citation(s):</b></p>

<p>'528 patent, cls. 1, 5, 14; '736 patent, cls. 1, 11, 15; '673 patent, cls. 1, 2, 7, 13, 19)</p>	<p><b>Citation(s):</b> Dkt. No. 36-1: PV 108 Op. Br. at 17-19, § IV.B; Dkt. No. 36-5: PV 108 Resp. Br. at 10-11, § III.B; Dkt. No. 36-6: PV 108 Rep. Br. at 4-5, § IV; 7-8, § V.B Dkt. No. 36-8: PV 562 Op. Br. at 35-36, § V.L; Dkt. No. 36-13: PV 562 Rep. Br. at 26-27, § IV.K; Dkt. No. 36-16: PV 870/945 Resp. Br. at 37-38, § IV.Q; Dkt. No. 36-22: PV 870/945 Sur-Rep. Br. at 14, § VII</p>	<p>Dkt. No. 32-18: TCL/Hisense Op. Br. at 32-33, § II.Q; Dkt. No. 32-42: TCL/Hisense Rep. Br. at 14, § I.H</p>
<p>8</p> <p>“switch” (’706 patent, cls. 105, 107, 109, 111, 114, 115, 164, 165, 166, 168, 175, 176, 179, 186, 187, 190; '518 patent, cl. 50; '444 patent, cl. 3; '835 patent, cls. 18, 19, 20; '513 patent, cl. 19; '528 patent, cls. 1, 5, 8, 17; '736 patent, cls. 1, 11, 15, 21, 26, 27; '673 patent, cls. 1, 6, 7, 13, 17, 18)</p>	<p><i>Plain and ordinary meaning</i> wherein the plain-and-ordinary meaning is “an electronic device for opening and closing a circuit as dictated by an independent control input”</p> <p><b>Citation(s):</b> Dkt. No. 36-1: PV 108 Op. Br. at 19-21, § IV.C; Dkt. No. 36-5: PV 108 Resp. Br. at 12-15, § III.C; Dkt. No. 36-6: PV 108 Rep. Br. at 4-5, § IV; 8-9, § V.C; Dkt. No. 36-16: PV 870/945 Resp. Br. at 43-44, § IV.V; Dkt. No. 36-22: PV 870/945 Sur-Rep. Br. at 14, § VII</p>	<p><i>Plain and ordinary meaning</i></p> <p><b>Citation(s):</b> Dkt. No. 33: Intel 108 Op. Br. at 41-43, § IV.I; Dkt. No. 32-90: Intel 108 Resp. Br. at 40-42, § III.I; Dkt. No. 32-97: Intel 108 Rep. Br. at 15, § III.I; Dkt. No. 32-18: TCL/Hisense Op. Br. at 36, § II.V; Dkt. No. 32-42: TCL/Hisense Rep. Br. at 14, § I.H</p>
<p>“switch module” (’902 patent, cl. 1)</p>		
<p>“switching device”</p>		

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