

July 26, 2022

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY: SV  
DEPUTY

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**PARKERVISION, INC.,**

**Plaintiff,**

**v.**

**LG ELECTRONICS, INC.,**

**Defendant.**

**Civil Action No. 6:21-cv-00520-ADA**

**TO THE APPROPRIATE JUDICIAL AUTHORITY OF TAIWAN:**

The United States District Court for the Western District of Texas presents its compliments to the Appropriate Judicial Authority of Taiwan, and requests judicial assistance to obtain evidence to be used in a civil proceeding before this Court in the above-captioned matters.

**I. Request.**

The Court respectfully requests that the Appropriate Judicial Authority of Taiwan compel production of documents and testimony of a representative or representatives from the following corporate entity:

Realtek Semiconductor Corp.  
No. 2, Innovation Road II,  
Hsinchu Science Park,  
Hsinchu 300, Taiwan

Specifically, the Court requests Realtek Semiconductor Corp. ("Realtek") to produce the documents and things set forth in Attachment A to this Request and

thereafter produce a witness or witnesses to testify regarding the deposition topics set forth in Attachment B. The Court requests the witness to be placed under oath, subject to questioning by counsel for the parties to the above-captioned matters, and that a verbatim transcript of the testimony be taken.

The Court understands that the documents and information requested may be of a confidential nature. As such, there is a Protective Order in this case to protect the confidentiality of any documents produced. A copy of the Protective Order is appended as Attachment C.

If service cannot be effected at the address indicated above, this Court respectfully requests judicial assistance to effect service by any means permitted under Taiwanese law.

This Court further requests that the executed Letters Rogatory and any evidence produced in response be sent by international courier and through a secure FTP link via email directly to counsel for the Requesting Party, ParkerVision, Inc. ("ParkerVision"), at the following mailing and email addresses:

Ronald M. Daignault  
Daignault Iyer LLP  
8618 Westwood Center Drive - Suite 105  
Vienna, VA 22182  
rdaignault@daignaultiyer.com

with copies to:  
Chandran B. Iyer at [cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)  
and Cathy Pampinella at [cpampinella@daignaultiyer.com](mailto:cpampinella@daignaultiyer.com).

## **II. Facts.**

Plaintiff ParkerVision filed a lawsuit against Defendant LG Electronics, Inc. ("LGE") in the United States District Court for the Western District of Texas. ParkerVision seeks a judgment that LGE infringes U.S. Patent Nos. 6,049,706; 6,266,518; 6,580,902; 7,110,444; 7,292,835; 8,588,725; 8,660,513; 9,118,528; 9,246,736 and 9,444,673 (the "Asserted Patents"). The technology described and claimed in the Asserted Patents relates to, among other things, integrated circuit chips used for wi-fi, Bluetooth and cellular communications. ParkerVision alleges that LGE televisions, and other products, use integrated circuit chips that Realtek manufactures and sells to LGE either directly or through third parties and that these chips read on claims in the Asserted Patents ("Realtek Chips"). ParkerVision seeks an award of damages from LGE to compensate ParkerVision for LGE's use of the Realtek Chips in its products and alleged patent infringement.

In response to ParkerVision's infringement claims, LGE has asserted defenses that include noninfringement and patent invalidity. The documents requested in Attachment A provide circuit-level detail of the accused chips used in LGE's accused products, technical information regarding the Realtek Chips that Realtek has sold or otherwise provided to LGE directly or through a third party, the agreements between Realtek and LGE and other third parties relating to the Realtek Chips, and the marketing and sale of the Realtek Chips. The deposition topics recited in Attachment B relate to the documents requested in Attachment A, as described generally above, and the authentication and business-record nature of the requested documents. The

requested documents and deposition testimony are therefore important to ParkerVision's ability to demonstrate LGE's infringement of the Asserted Patents and to properly and fully respond to LGE's defenses.

**III. Offer of Reciprocal Assistance.**

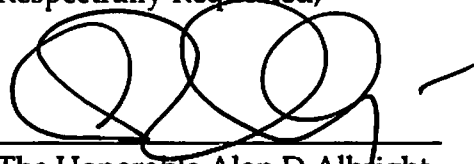
The United States District Court for the Western District of Texas is willing to provide similar assistance to the Appropriate Judicial Authority of Taiwan. See 28 U.S.C. § 1782.

**IV. Reimbursement for Costs.**

This Court, through Plaintiff ParkerVision, is willing to reimburse the Appropriate Judicial Authority of Taiwan for costs and expenses incurred in executing these Letters Rogatory.

DATED this 25<sup>th</sup> day of July, 2022.

Respectfully Requested,



The Honorable Alan D Albright  
United States District Judge  
for the Western District of Texas  
800 Franklin Avenue  
Waco, Texas 76701  
United States of America  
Tel.: +1 (254) 750-1519

(SEAL OF THE COURT)



A true copy of the original, I certify.  
Clerk, U.S. District Court

By SV  
July 26, 2022 Deputy