

**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 MOTION TO STAY**

Plaintiff ParkerVision, Inc. (“ParkerVision”) and Defendant LG Electronics, Inc. (“LGE”) (collectively, “the Parties”) jointly move to stay all deadlines in this matter for 3 months until and through February 3, 2023, to provide ParkerVision with additional time to secure third-party discovery from Realtek and MediaTek related to the accused products.

On July 12, 2022, ParkerVision filed an unopposed motion for issuance of Letters Rogatory to Realtek and MediaTek. Dkt. Nos. 60 & 61. In its Motions, ParkerVision stated that the information in Realtek and MediaTek’s possession is “important to ParkerVision’s ability to demonstrate LGE’s infringement of the Asserted Patents.” *Id.* at 4.

On July 26, 2022, this Court granted issuance of Letters Rogatory to Realtek and MediaTek. Dkt. Nos. 62 & 63.

As of November 4, 2022, ParkerVision has not received any discovery from either third party and is seeking to stay the case to allow the Letters Rogatory to proceed. LGE does not oppose ParkerVision’s request. *Sequent Energy Management, L.P. v. CPS Energy*, No. SA-21-CV-00395, Dkt. No. 31 (W.D. Tex. Dec. 13, 2021) (granting joint stipulation to extend case

schedule); *see also* *B&D Produce Sales, LLC v. Packman I, Inc.*, No. SA-16-CV-99-XR, 2016 WL 4435275, at \*1 (W.D. Tex. Aug. 19, 2016) (“A district court has the inherent power to stay proceedings.”). Third party discovery will proceed during the stay. Upon expiration of the stay, the Parties will propose a new schedule, with fact discovery proceeding for at least 30 days after the stay is lifted to permit the parties to propound additional discovery and complete depositions of fact witnesses.

The parties’ requested stay may also streamline the issues before this Court. *See, e.g., Kirsch Research & Development, LLC v. IKO Indus., Inc.*, No. 6:20-CV-00317-ADA, 2021 WL 4555610, at \*2 (E.D. Tex. Mar. 11, 2015) (outlining factors considered by courts in the stay context, including potential for simplifying issues, prejudice to the nonmovant, and the state of the case). For example, final written decisions are expected by the end of November in *TCL Indus. Holdings Co., Ltd. v. ParkerVision, Inc.* IPR2021-00990 and in *TCL Indus. Holdings Co., Ltd. v. ParkerVision, Inc.* IPR2021-00985. IPR2021-00990 and IPR2021-00985 involve U.S. Patent Nos. 7,110,444 and 7,292,835, respectively, which are the only unexpired patents asserted in this case. The Patent Trial and Appeal Board’s final written decisions in IPR2021-00990 and IPR2021-00985, therefore, may streamline the issues before this Court. There is also no prejudice to either party as the motion is joint and the parties will benefit from the potential streamlining of issues in this case.

Thus, to allow ParkerVision to proceed through its Letters Rogatory, and to avoid wasting the Court’s and the Parties’ time and resources, the Parties jointly request that the Court grant a modest 3-month stay.

Dated: November 8, 2022

/s/Raymond W. Mort, III

Raymond W. Mort, III  
Texas State Bar No. 00791308  
[raymort@austinlaw.com](mailto:raymort@austinlaw.com)

THE MORT LAW FIRM, PLLC  
100 Congress Avenue, Suite 2000  
Austin, Texas 78701  
Tel/Fax: 512-865-7950

*Of Counsel:*

Ronald M. Daignault (*pro hac vice*)\*  
Chandran B. Iyer (*pro hac vice*)  
Jason S. Charkow (*pro hac vice*)\*  
[rdaignault@daignaultiyer.com](mailto:rdaignault@daignaultiyer.com)  
[cbiyer@daignaultiyer.com](mailto:cbiyer@daignaultiyer.com)  
[jcharkow@daignaultiyer.com](mailto:jcharkow@daignaultiyer.com)

DAIGNAULT IYER LLP  
8618 Westwood Center Drive  
Suite 150  
Vienna, VA 22182  
*\*Not admitted in Virginia*

*Attorneys for ParkerVision, Inc.*

Respectfully submitted,

/s/ Steven Pepe

Melissa R. Smith  
**GILLAM & SMITH, LLP**  
TX State Bar No. 24001351  
303 S. Washington Avenue  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257  
[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

Steven Pepe  
Matthew Shapiro  
Michael Morales  
James Stevens  
**ROPES & GRAY LLP**  
1211 Avenue of the Americas  
New York, NY 10036-8704  
Tel: 212.596.9000  
Fax: 212.596.9090  
[Steven.Pepe@ropesgray.com](mailto:Steven.Pepe@ropesgray.com)  
[Matthew.Shapiro@ropesgray.com](mailto:Matthew.Shapiro@ropesgray.com)  
[Michael.Morales@ropesgray.com](mailto:Michael.Morales@ropesgray.com)  
[James.Stevens@ropesgray.com](mailto:James.Stevens@ropesgray.com)

David S. Chun  
Stepan Starchenko  
**ROPES & GRAY LLP**  
1900 University Ave., 6th Floor  
East Palo Alto, CA 94303-2284  
Tel: 650.617.4000  
Fax: 650.617.4090  
[David.Chun@ropesgray.com](mailto:David.Chun@ropesgray.com)  
[Stepan.Starchenko@ropesgray.com](mailto:Stepan.Starchenko@ropesgray.com)

Scott Taylor  
(Admission application forthcoming)  
**ROPES & GRAY LLP**  
Prudential Tower  
800 Boylston Street  
Boston, MA 02199-3600  
Tel: 617.951.7000  
Fax: 617.951.7050  
[Scott.Taylor@ropesgray.com](mailto:Scott.Taylor@ropesgray.com)

*Attorneys for Defendant LG Electronics Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on November 8, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(b)(1).

/s/ Melissa R. Smith

Melissa R. Smith