## 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

NOTICE OF SUPPLEMENTAL AUTHORITY

In connection with Defendant LG Electronics, Inc.'s ("LGE") Miscellaneous Objections ("Objections") to Magistrate Judge Gilliland's Claim Construction Order and Memorandum in Support Thereof (Dkt. No. 59), LGE provides this notice of supplemental authority to inform the Court of the Patent Trial and Appeal Board's ("PTAB") recent Final Written Decisions in IPR2021-00985 and IPR2022-00246, finding unpatentable claims 1, 12-15, and 17-20 of U.S. Patent No. 7,292,835 ("the '835 patent"), and IPR2021-00990 finding unpatentable claims 2-4 of U.S. Patent No. 7,110,444 ("the '444 patent"). A true and correct copy of the Final Written Decision in IPR2021-00985 and IPR2021-00246, dated November 17, 2022, is attached hereto as Exhibit A, and the same for the Final Written Decision in IPR2021-00990, dated November 21, 2022, is attached hereto as Exhibit B.

The PTAB construed the "storage module" term in the '835 patent (*see* Ex. A at 14-21) in IPR2021-00985 and IPR2021-00246, in addition to the "storage element" term in the '444 patent (*see* Ex. B at 14-21) in IPR2021-00990. Both terms are at issue in LGE's Objections. Dkt. No. 59 at 2-8; *see also* Dkt. No. 55 at 12.



Dated: November 22, 2022 Respectfully submitted,

/s/ Melissa R. Smith

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

Steven Pepe

Matthew Shapiro

James Stevens

Michael Morales

### **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

Matthew.Shapiro@ropesgray.com James.Stevens@ropesgray.com

Michael.Morales@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

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

Attorneys for Defendant LG Electronics Inc.



# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on November 22, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document.

/s/ Melissa R. Smith
Melissa R. Smith

