

EXHIBIT A

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

PARKERVISION, INC.,
Plaintiff,

v.

REALTEK SEMICONDUCTOR CORP.,
Defendant.

Case No. 6:22-cv-01162-ADA

**REALTEK SEMICONDUCTOR CORP.'S FIRST SET OF REQUESTS FOR
PRODUCTION TO PLAINTIFF PARKERVISION, INC.
REGARDING FACT DISCOVERY**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Realtek Semiconductor Corp. (“Realtek”) requests that Plaintiff ParkerVision, Inc. (“Plaintiff” or “ParkerVision”) respond to the following Requests for Production (“Requests”) in accordance with the Federal Rules of Civil Procedure, and apply the Definitions and Instructions set forth below.

DEFINITIONS AND INSTRUCTIONS

1. “You,” “Plaintiff,” or “ParkerVision” means (i) Plaintiff ParkerVision, Inc., (ii) its present or former directors, principals, owners, members, officers, employees, agents, representatives, accountants, investigators, consultants, attorneys, and predecessors or successors in interest, and any parent, subsidiary, joint venture, affiliated entities or other legal entities that are wholly or partially owned or controlled, either directly or indirectly, that were in existence during the applicable period of time covered by these Requests; (iii) any other Person acting on their behalf or on whose behalf they acted; and (iv) any other Person otherwise subject to their control, or which controls them, or with which they are under common control.

2. “Defendant” or “Realtek” means Realtek Semiconductor Corp.

3. “Party” or “Parties” refers to the Defendant and the Plaintiff.
4. “Action” means the case captioned *ParkerVision, Inc. v. Realtek Semiconductor Corp.*, Case No. 6:22-cv-01162-ADA in the Western District of Texas, and any appeals thereof.
5. “Complaint” means the Complaint for Patent Infringement filed by ParkerVision, Inc. in this Action on November 10, 2022, as well as any supplements thereof or amendments thereto.
6. “’706 Patent” means U.S. Patent No. 6,049,706—including any reexamination certificate and certificate of correction.
7. “’518 Patent” means U.S. Patent No. 6,266,518—including any reexamination certificate and certificate of correction.
8. “’835 Patent” means U.S. Patent No. 7,292,835—including any reexamination certificate and certificate of correction.
9. “’513 Patent” means U.S. Patent No. 8,660,513—including any reexamination certificate and certificate of correction.
10. “Asserted Patents” or “Patents-in-Suit” mean the ’706 Patent, the ’518 Patent, the ’835 Patent, and the ’513 Patent.
11. “Related Application” means any parent or ancestral application related in any way to the Asserted Patents and any continuing application, continuation-in-part application, divisional application, file-wrapper continuation, reexamination proceeding, reissue application, abandoned application or foreign counterpart application for that patent.
12. “Related Patent” means any patent that issued from any Related Application.
13. “Prior Art” has the same meaning as it has in the applicable version of 35 U.S.C. §§ 102 and/or 103. This meaning includes any patent, printed publication, physical product or

component, prior knowledge, prior use, prior sale or offer for sale, or other act or event defined in 35 U.S.C. §§ 102 and/or 103, taken alone or in combination.

14. “Written Description” shall refer to the requirement that “[t]he specification shall contain a written description of the invention” as set forth in 35 U.S.C. § 112.

15. “Enabling Disclosure” shall refer to the requirement that “[t]he specification shall contain a written description of . . . the manner and process of making and using [the invention], in such full, clear, concise, and exact terms as to enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to make and use the same...” as set forth in 35 U.S.C. § 112.

16. “Named Inventor” shall mean any person listed as an inventor on the face of any patent-in-suit.

17. “Third Party” means any person or entity other than ParkerVision and Realtek.

18. “Document” is used in the most comprehensive and inclusive sense permitted by the Federal Rules of Civil Procedure, and includes but is not limited to all of the following matter in Your actual or constructive possession, custody, or control: all written, handwritten, typewritten, drawn, graphic, printed, recorded, magnetic, optical, electronic, or otherwise produced or reproduced matter or medium of any kind on which any intelligence or information is recorded or stored, or from which any intelligence or information can be obtained, translated, if necessary, by ParkerVision through detection devices into reasonably usable form. “Document” includes but is not limited to the original and any non-identical copy, whether different from the original because of any notes, marks, alterations, writings, or other changes made on said copy or otherwise. By way of example, and not by way of limitation, “Document” includes any advertising literature; agreement; archive record; bank record or statement;

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