

EXHIBIT B

IN THE 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

JURY TRIAL DEMANDED

**PLAINTIFF PARKERVISION INC.'S RESPONSES AND OBJECTIONS TO
DEFENDANT REALTEK SEMICONDUCTOR CORP.'S FIRST SET OF
REQUESTS FOR PRODUCTION (NOS. 1-63)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiff ParkerVision, Inc. (“ParkerVision” or “Plaintiff”) hereby responds to Defendant Realtek Semiconductor Corp.’s (“Realtek” or “Defendant”) First Set of Requests for Production (Nos. 1-63) as follows:

GENERAL OBJECTIONS

ParkerVision makes the following general responses and objections (“General Objections”), which apply to each individual Request, whether specifically restated therein, and shall have the same force and effect as if fully set forth or specifically cited in response to each individual Request.

1. ParkerVision objects to each Request to the extent that it seeks information, documents, or things protected by any applicable privilege including, without limitation, the attorney-client privilege, the work product doctrine, or any other applicable privilege, immunity and valid grounds for withholding documents or information from production (“privileged

material”). Nothing contained in ParkerVision’s responses is intended to be, or in any way shall be deemed to be, a waiver of any applicable privilege or immunity. In responding to each Request, ParkerVision will not provide privileged or otherwise protected information, documents, or things. Any inadvertent release of privileged information, documents, or material shall not constitute a waiver of any applicable privilege or immunity with respect to the information, documents, or things produced.

2. ParkerVision objects to each Request to the extent that it seeks information, documents, or things, that are not in ParkerVision’s possession, custody, or control and/or require more than a reasonable search to locate. ParkerVision further objects to each Request to the extent it seeks information, documents, or things that are already in the possession, custody, or control of Defendant or third parties. ParkerVision further objects to each Request to the extent it seeks information, documents or things that are in the public domain and are of no greater burden for Defendant to obtain than ParkerVision. In responding to the Requests, ParkerVision will not conduct searches of publicly accessible databases, publicly available literature, or publicly accessible libraries, or collect or organize information, documents, or things that are as accessible to Defendant as they are to ParkerVision. Unless otherwise indicated specifically below, ParkerVision will not produce such documents or disclose such information.

3. ParkerVision objects to each and every Request, Definition, and Instruction to the extent they seek to impose obligations or responsibilities on ParkerVision in addition to or different from those mandated by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Western District of Texas, or any other applicable rule, law, or doctrine.

4. ParkerVision further objects to these “Definitions” and “Instructions” to the extent they purport to alter the plain meaning or scope of any Request on the ground that such alteration renders the Request vague, ambiguous, overly broad, or unduly burdensome.

5. ParkerVision objects to Defendant’s definition of “You,” “Plaintiff,” and/or “ParkerVision” as overly broad, unduly burdensome, vague, ambiguous, and imposing on ParkerVision a burden of production that exceeds those required under the Federal Rules of Civil Procedure.

6. ParkerVision objects to Defendant’s definitions of “Related Application” and “Related Patent” as overly broad, unduly burdensome, vague, and ambiguous. ParkerVision further objects to each definition as it is used to seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

7. ParkerVision objects to Defendant’s definitions of “document,” “communication,” “thing(s),” and “agreement” as overly broad, unduly burdensome, vague, and ambiguous. ParkerVision further objects to the definitions to the extent they seek to impose discovery obligations in excess of those required by Rules 26 and 34 of the Federal Rules of Civil Procedure, the Court’s Local Rules, or any applicable court order.

8. ParkerVision objects to Defendant’s definition of “discuss,” “concern,” “concerning,” “refer to,” “relate to,” and “relating to” as overly broad, unduly burdensome, vague, ambiguous, and imposing on ParkerVision a burden of production that exceeds those required by Rules 26 and 34 of the Federal Rules of Civil Procedure, the Court’s Local Rules, or any applicable court order.

9. ParkerVision objects to each Request to the extent it seeks information or documents containing private, confidential, trade secret, proprietary and/or sensitive business information of ParkerVision, its employees, and/or third parties to the extent that ParkerVision is under any obligation—imposed by a third party, a court, tribunal, legislature, or any other body with authority to impose or enforce such an agreement, statute, regulation, or order—to maintain it in confidence and not disclose it.

10. ParkerVision objects to each Request to the extent it seeks: (i) information regarding any right, title, or interest in the outcome of this litigation; and/or (ii) information regarding any financing related to the litigation.

11. ParkerVision objects to each Request to the extent it calls for competitively sensitive documents or information comprising trade secrets or other confidential research, development, or commercial information.

12. ParkerVision objects to each Definition, Instruction, and Request to the extent it is vague, ambiguous, overly broad, unduly burdensome, irrelevant, duplicative, cumulative, or not proportional to the needs of the case.

13. ParkerVision objects to each Request to the extent it is cumulative or duplicative of other discovery, including other interrogatories, requests for production, and requests for admission. ParkerVision further objects to the extent it seeks information, documents, or things that are more properly addressed by other forms of discovery.

14. ParkerVision objects to each Request to the extent it is compound and contains multiple impermissible subparts.

15. ParkerVision objects to each Request as overly broad, unduly burdensome, and not proportional to the needs of the case, particularly to the extent it seeks “all,” “each,” “every,” or “any” of a category of information.

16. ParkerVision objects to each Request to the extent it is premature, and ParkerVision’s response to each Request is without prejudice to this objection. ParkerVision reserves the right to amend, and/or supplement each of its responses, including in response to any Court Order or agreement between the parties.

17. ParkerVision objects to each Request to the extent it is unbounded in time and seeks information for periods of time that are not relevant to any claim or defense.

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