

# EXHIBIT C

**From:** [Wang, Grace](#)  
**To:** [Austin Ciuffo](#)  
**Cc:** [PH-RLTK-PV-I](#); [PV](#); [Mark Siegmund](#)  
**Subject:** RE: ParkerVision v. Realtek - Meet & Confer Required  
**Date:** Thursday, April 25, 2024 4:54:35 PM

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Austin,

Realtek made a production on Monday, and made another production earlier today. We anticipate that this week's productions should resolve the issues you outlined below. If you review our productions and determine there is still a need to meet and confer, please let us know.

Also, during last Wednesday's meet and confer, Jason stated that ParkerVision should have been out of the notice period for its settlement agreements, and would be producing all settlement agreements shortly. Based on our review of ParkerVision's production, we only identified patent settlement agreements with Samsung, Buffalo, and Zyxel. Please provide a date certain by which ParkerVision will produce the remaining settlement agreements.

We also wanted to confirm Jason's statements during the meet and confer regarding ParkerVision's productions from prior litigations. Jason had stated that ParkerVision's production in its LG and TCL litigations included everything in its production from the Intel litigation, and no other documents. Jason further stated that ParkerVision's production in the Intel litigation included everything it had produced in the Qualcomm litigation, plus additional documents. Please confirm our understanding is correct. Based on our review, ParkerVision has only produced documents it produced from the Qualcomm litigation. Please provide a date certain by which ParkerVision will produce the documents it produced in the LG, TCL, and Intel litigations.

Further, ParkerVision stated that it would not produce expert reports from other litigations given the confidential information of other defendants. When we specifically raised validity/invalidity reports, Jason stated that all those reports also include third party confidential information. Please confirm which third party confidential information are included in the validity/invalidity reports by April 29 so that we can seek permission from these third parties to have a copy of these reports.

Regards,  
Grace

**From:** Austin Ciuffo <aciuffo@daignaultiyer.com>  
**Sent:** Monday, April 22, 2024 6:04 PM  
**To:** Wang, Grace <gracewang@paulhastings.com>  
**Cc:** PH-RLTK-PV-I <PH-RLTK-PV-I@paulhastings.com>; PV <PVLit@daignaultiyer.com>  
**Subject:** [EXT] ParkerVision v. Realtek - Meet & Confer Required

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Counsel,

Realtek's responses/production to ParkerVision's Interrogatories and Requests for Production are severely deficient (see the attached spreadsheet). Please provide your availability to meet and confer about the below issues on either 24/25/26 April 2024.

1. ParkerVision's First Set of RFPs served on January 16, 2024.

Realtek responded that it would provide non-privileged, relevant materials responsive to Request nos. 8, 9, 11, 12, 13, 15, 16, 20, 23, 26, 27, 29, 32, 34, 39, and 40. Realtek has provided zero documents responsive to each of those Requests. In sum, Realtek has produced (8) limited financial documents: (7) the 2016-2022 annual reports for Realtek that do not offer chip-specific or other related financial data (many of which are written in Chinese), and (1) a settlement and patent license agreement between Avago and Realtek. These documents as a response to Request nos. 8, 25, and 28 are deficient. Further, the parties must meet and confer regarding Request nos. 17, 21, 28, 44, and 45.

2. ParkerVision's First set of Interrogatories served on January 16, 2024.

Realtek's response to Interrogatory No. 3 is deficient for failing to comply with Rule 33(d) of the Fed. Rules of Civ. Procedure. To the extent Realtek responds that "Realtek will produce documents in response to this Interrogatory," Realtek must supply the production numbers for such documents. The parties must meet and confer regarding Interrogatory No. 4. Further, regarding Interrogatory No. 10, Realtek's response that its investigation is "ongoing and Realtek reserves all rights to amend, modify, or supplement the information herein as discovery continues" is deficient. Realtek has had over ninety days to supplement Interrogatory No. 10 and has failed to do so.

3. Sales information.

Realtek unilaterally decided that it will provide "non-privileged, relevant materials *for the United States* responsive" to certain Requests. In light of the Federal Circuit's decision in *Harris Brumfield v. IBG LLC*, ParkerVision is entitled to international financial information insofar as it relates to the license, purchase, sale, offer for sale, importation, and/or distribution of accused Realtek Chips with a causal infringing relationship to infringement occurring within the United States—a determination ripe for ParkerVision's damages expert in preparing his/her expert report. Thus, ParkerVision is entitled to documents reflecting *all* Realtek sales of accused products both in the United States and outside of the United States.

Please provide your availability for a meet and confer on April 24, 25 or 26 regarding Realtek's deficient fact discovery responses and production. We will seek the Court's assistance if we are unable to obtain sufficient assurances that Realtek will cure the discovery deficiencies mentioned above.

Best,

Austin Ciuffo



Austin J. Ciuffo  
Associate

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