

# Exhibit A

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

PARKERVISION, INC.,

Plaintiff,

v.

REALTEK SEMICONDUCTOR CORP.,

Defendants.

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**NO. 6:22-cv-01162-ADA**

**DEFENDANT’S SUR-REPLY IN OPPOSITION TO  
PLAINTIFF’S MOTION FOR LEAVE TO EFFECT ALTERNATIVE SERVICE**

Plaintiff ParkerVision, Inc.’s (“Plaintiff” or “ParkerVision”) Reply filed on February 17, 2023 (Dkt. 13) should be disregarded (1) as untimely, and (2) for improperly relying on the U.S. Department of State’s website.

First, ParkerVision’s Reply was filed four days late. Pursuant to Rule CV-7 of the Local Rules for the Western District of Texas, “[a] reply in support of a motion shall be filed not later than 7 days after the filing of the response to the motion.” Under similar facts, this Court has stricken a party’s untimely reply for being filed more than 7 days after the filing of the response to the motion. *Bd. of Regents of U. of Tex. Sys. v. Reynolds*, 2019 WL4980445 at \*1 (W.D. Tex. April 4, 2019).

Second, ParkerVision’s Reply improperly relies on the U.S. Department of State’s website<sup>1</sup> to mitigate ParkerVision’s admission that service is only proper in Taiwan through Letters Rogatory. Indeed, the website itself includes a disclaimer that states that the website cannot be relied upon for interpretation of foreign law—a disclaimer that ParkerVision omits from its Reply:

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<sup>1</sup> <https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/Taiwan.html>

DISCLAIMER: THE INFORMATION IS PROVIDED FOR GENERAL INFORMATION ONLY AND MAY NOT BE TOTALLY ACCURATE IN A SPECIFIC CASE. QUESTIONS INVOLVING INTERPRETATION OF SPECIFIC FOREIGN LAWS SHOULD BE ADDRESSED TO THE APPROPRIATE FOREIGN AUTHORITIES OR FOREIGN COUNSEL.

Accordingly, ParkerVision cannot rely on the website to support its argument that Realtek was “properly served” on December 19, 2022 via FedEx. *See* Dkt. 13, 1. Regardless, as ParkerVision acknowledges, the website explicitly states that “Taiwan may not consider service by registered mail or by agent acceptable and may require that service be effected pursuant to letters rogatory.” *Id.*, 1-2.

Accordingly, for the reasons above and those discussed in Realtek’s Opposition (Dkt. 11), the Court should disregard ParkerVision’s Reply and deny Plaintiff’s Motion for Leave to Effect Alternative Service because ParkerVision has not yet attempted proper service.

DATED: February 23, 2023

Respectfully submitted,

By: /s/ Mark D. Siegmund

Mark D. Siegmund

State Bar No. 24117055

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