EXHIBIT 3

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

PARKERVISION, INC.,

Plaintiff,

v.

LTD., SHENZHEN TCL NEW

LTD., TCL ELECTRONICS HOLDINGS TECHNOLOGY CO., LTD., TCL KING

ELECTRICAL APPLIANCES (HUIZHOU) CO., LTD., TCL MOKA INT'L LTD., and TCL MOKA

TCL INDUSTRIES HOLDINGS CO.,

MANUFACTURING S.A. DE C.V.,

HISENSE CO., LTD. and HISENSE VISUAL TECHNOLOGY CO., LTD. (F/K/A QINGDAO HISENSE ELECTRONICS CO.), LTD. and HISENSE ELECTRIC CO., LTD.

Defendants.

Case No. 6:20-cv-00945-ADA

Case No. 6:20-cv-00870-ADA

JURY TRIAL DEMANDED

[CORRECTED] PARKERVISION, INC.'S RESPONSIVE **CLAIM CONSTRUCTION BRIEF**



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II.	TECH	NOLOGY BACKGROUND1	
III.	THE	PATENTS-IN-SUIT	
IV.	DISPUTED TERMS		
	A.	"Low Impedance Load" ('736 patent, claims 26, 27; '673 patent, claim 5)	
	B.	"said energy discharged from said capacitor provides sufficient power to drive the low impedance load" ('673 patent, claim 5)	
	C.	"Storage" Terms ('706 claims 105, 114, 115, 164, 166, 168, 175, 179, 186, 190; '902 claim 1; '444 claim 3; '835 claims 1, 18, 20; '725 claims 1, 6, 17, 18, 19; '513 claim 19; '528 claims 1, 9; '736 claims 1, 11, 21, 26, 27; '673 claims 13, 17, 18)	
		1. Defendants' collateral estoppel argument is a red herring	
		2. Defendants' claim differentiation argument is fatally flawed	
	D.	"voltage of the input modulated carrier signal is not reproduced or approximated at the capacitor during the apertures or outside of the apertures" ('673 patent, claim 2)	
	E.	"a down-convert and delay module to under-sample an input signal to produce an input sample of a down-converted image of said input signal, and to delay said input sample" ('706 patent, claims 1, 7)	
	F.	"delay module" terms ('706 patent, claims 1, 7, 34, 140)	
	G.	"said control signal comprises a train of pulses having pulse widths that are established to improve energy transfer from said input signal to said down-converted image" ('706 patent, claim 2)	
	Н.	"means for under-sampling an input signal to produce an input sample of a down-converted image of said input signal" ('706 patent, claim 6)	
	I.	"first delaying means for delaying said input sample" ('706 patent, claim 6) 26	
	J.	"a frequency translator to produce a sample of a down-converted image of an input signal, and to delay said sample" ('706 patent, claim 34)29	



K.	"wherein said energy transfer signal generator in widening said apertures of said pulses by a non-negligible amount that tends away from zero time in duration to extend the time that said switch is closed for the purpose of increasing energy transferred from said input signal does so at the expense of reproducing said input signal, such that said increased energy transferred from said input signal when said switch is closed in response to said energy transfer signal prevents substantial voltage reproduction of said input signal" ('706 patent, claim 111)	
L.	"establishing apertures" terms ('706 patent, claims 165, 107, 176, 187)	
M.	"frequency down-conversion module" ('444 patent, claims 2, 3)	
N.	"Under-Sample" / "Under-Samples" / "Under-Sampling" ('706 patent, claims 1, 6, 7, 28; '444 patent, claim 2)	
O.	"harmonic" / "harmonics" ('706 patent, claims 1, 6-7, 28, 34; '518 patent, claim 1)	
P.	"Integral Filter/Frequency Translator to Filter and Down-Convert an Input Signal" ('706 patent, claim 28)	
Q.	"Modulated Signal" / "Modulated Carrier Signal" ('706 patent, claim 127; '513 patent, claim 19; '528 patent, claims 1, 5; '736 patent, claims 1, 11, 15; '673 patent, claims 1, 2, 7, 13, 19)	
R.	"universal frequency downconverter (UFD)" ('518 patent, claim 50)	
S.	[wherein said storage elements comprises] "a capacitor that reduces a DC offset voltage in said first-down converted signal and second down converted signal" ('444 patent, claim 4)	
T.	"DC offset voltage" ('444 patent, claim 4)	
U.	"sampling aperture" ('513 patent, claim 19; '528 patent, claim 1; '736 patent, claims 1, 11; '673 patent, claims 13, 17, 19)	
V.	"Switch" / "Switching Device" / "Switching Module" / "Switch Module" ('706 patent, claims 105, 107, 109, 111, 114, 115, 164, 165, 166, 168, 175, 176, 179, 186, 187, 190; '518 patent, claim 50; '902 patent, claim 1; '444 patent, claim 3; '835 patent, claims 18, 19, 20; '725 patent, claim 1; '513 patent, claim 19; '528 patent, claims 1, 5, 8, 17; '736 patent, claims 1, 11, 15, 21, 26, 27; '673 patent, claims 1, 6, 7, 13, 17, 18)	
W.	"a down-converted signal being generated from said sampled energy" ('902 patent, claim 1)	
CONC	CLUSION	



V.

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