

EXHIBIT 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
3 WACO DIVISION

3 PARKERVISION, INC. *
4 VS. * August 30, 2023
5 REALTEK SEMICONDUCTOR *
6 CORP. * CIVIL ACTION NO. 6:22-CV-1162

7 BEFORE THE HONORABLE ALAN D ALBRIGHT
8 DISCOVERY HEARING (via Zoom)

9 APPEARANCES:

10 For the Plaintiff: Jason S. Charkow, Esq.
11 Ronald M. Daignault, Esq.
12 Daignault Iyer LLP
13 8618 Westwood Center Drive, Ste 150
14 Vienna, VA 22182

15 Zachary H. Ellis, Esq.
16 The Mort Law Firm, PLLC
17 100 Congress Ave, Ste 2000
18 Austin, TX 78701

19 For the Defendant: Grace I. Wang, Esq.
20 Allen & Overy LLP
21 1221 Avenue Of The Americas
22 New York, NY 10020

23 Mark Siegmund, Esq.
24 Cherry Johnson Siegmund James, PLLC
25 The Roosevelt Tower
400 Austin Avenue, 9th Floor
Waco, Texas 76701

26 Court Reporter: Kristie M. Davis, CRR, RMR
27 PO Box 20994
28 Waco, Texas 76702-0994
29 (254) 340-6114

30 Proceedings recorded by mechanical stenography,
03:58 31 transcript produced by computer-aided transcription.

32

03:58 1 (Hearing begins.)

03:58 2 DEPUTY CLERK: A civil action in Case

03:59 3 6:22-CV-1162, ParkerVision, Inc. versus Realtek

03:59 4 Semiconductor Corp. Case called for a discovery

03:59 5 hearing.

03:59 6 THE COURT: Announcements from counsel,

03:59 7 please.

03:59 8 MR. CHARKOW: Good afternoon, Your Honor.

03:59 9 This is Jason Charkow with the Daignault Iyer firm on

03:59 10 behalf of ParkerVision. With me today, I have Zak

03:59 11 Ellis and Ron Daignault, also the same firm.

03:59 12 THE COURT: Are you going to be doing the

03:59 13 arguing?

03:59 14 MR. CHARKOW: I am.

03:59 15 THE COURT: Because I can't hear you very

03:59 16 well.

03:59 17 MR. CHARKOW: Uh-oh. That's not good.

03:59 18 Can you hear me now? I put the

03:59 19 microphone closer to my mouth.

03:59 20 THE COURT: Yeah. That's much better.

03:59 21 Thank you.

03:59 22 MR. CHARKOW: Okay. Sorry about that.

03:59 23 THE COURT: No problem.

03:59 24 Mr. Siegmund?

03:59 25 MR. SIEGMUND: Good afternoon, Your

03:59 1 Honor. Mark Siegmund on behalf of defendant Realtek.
03:59 2 With me this afternoon is Grace Wang with Allen &
03:59 3 Overy, and she's going to be arguing this matter on
03:59 4 behalf of defendant.

03:59 5 We're ready to proceed.

03:59 6 THE COURT: Okay. And the issue is
03:59 7 whether or not we should grant ParkerVision's relief.
04:00 8 I'll hear from them.

04:00 9 MR. CHARKOW: Thank you, Your Honor.

04:00 10 So where we are right now, Your Honor, as
04:00 11 you're aware, is we're in preliminary infringement
04:00 12 contention stages and defendants are about to produce
04:00 13 their preliminary invalidity contentions.

04:00 14 As Your Honor's also aware, part of that
04:00 15 is the -- we produced technical documents with your
04:00 16 preliminary -- they're supposed to produce preliminary
04:00 17 documents with -- technical documents with the
04:00 18 preliminary invalidity contentions. And so we sent
04:00 19 them an e-mail clarifying, you know, what we're
04:00 20 seeking.

04:00 21 That's what resulted in the dispute
04:00 22 that's before Your Honor right now. Basically, Realtek
04:00 23 has -- is refusing to produce any technical documents
04:00 24 other than the one, I guess, schematics or technical
04:00 25 documents for one Realtek chip.

04:00 1 So this case is about wireless chips,
04:00 2 Your Honor. These are those -- you know, these very
04:00 3 small chips that, you know, where they're highly
04:00 4 confidential schematics. These are not publicly
04:01 5 available information.

04:01 6 You know, to get to this point,
04:01 7 ParkerVision had to perform expensive and
04:01 8 time-consuming circuit extractions to chart the -- the
04:01 9 product that ParkerVision charted.

04:01 10 With regards to other products, Your
04:01 11 Honor, we identified, I think, 22 other chips. We
04:01 12 believe those chips are the same or similar
04:01 13 configuration to the chip that we charted. We provided
04:01 14 Realtek with the basis why we believed that was the
04:01 15 case. We provided a declaration of Dr. Ricketts.

04:01 16 Dr. Ricketts has over 25 years'
04:01 17 experience in the industry, in the integrated circuit
04:01 18 industry for chips of this type. He explains very
04:01 19 clearly in his declaration that he believes that, based
04:01 20 on his knowledge of how companies reuse circuit
04:01 21 architecture, reviewing Realtek patents as well as a
04:02 22 paper that was sponsored by Realtek, given all that
04:02 23 information, he concluded that it is reasonable to
04:02 24 assume that the additional chips are reasonably similar
04:02 25 to the chips that we charted.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.