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10 11	Attorneys for Defendant <b>APPLE INC.</b>			
12		TEC	DISTRICT COL	ID T
13	UNITED STATES DISTRICT COURT			
14	NORTHERN DISTRICT OF CALIFORNIA SAN JOSE			
15		GAIN	JUSE	
16	OPENTV, INC., NAGRAVISION, S.A., ar	nd	Case No. 5:15	5-cv-02008-EJD
17	NAGRA FRANCE S.A.S.	10		T APPLE INC.'S ANSWER
18	Plaintiffs,		TO COMPL COUNTERO	AINT AND
19	V.		Case Filed: M	
20	APPLE INC.,		Judge: Honor	able Edward J. Davila
21	Defendant.			
22	Defendant Apple Inc. ("Apple") by	and	through its unders	igned attorneys responds to the
23	Defendant Apple Inc. ("Apple"), by and through its undersigned attorneys, responds to the			
24	Complaint for Patent Infringement (the "Complaint") filed by Plaintiffs OpenTV, Inc. ("OpenTV") Nagravision, S.A. ("Nagravision"), and Nagra France S.A.S. (collectively, the			
25 26	"Plaintiffs") on May 5, 2015, as follows:			
26 27				
27				
				Appi f Inc 's Answer to Complaint
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Apple admits that the Plaintiffs filed an action against Apple alleging patent
 infringement. Except as expressly admitted herein, Apple denies each remaining allegation set
 forth in Paragraph 1.

4 2. Apple is without knowledge or information sufficient to form a belief as to the
5 truth of the allegations in Paragraph 2 and on that basis denies each and every allegation
6 contained therein.

7 3. Apple admits that its products and services include mobile devices running iOS 8 (including iPhone, iPad, and iPod touch), Apple TV, iTunes, App Store, and computers running 9 the OS X operating system. Apple admits that the Complaint purports to allege infringement of 10 U.S. Patent Nos. 6,148,081, 6,233,736, 7,055,169, 7,644,429, and 7,725,740 (collectively, the 11 "Asserted Patents"). Apple admits that Paragraph 3 of the Complaint accurately states the titles 12 that appear on the faces of the Asserted Patents and that Exhibits A through E of the Complaint 13 appear to be copies of the Asserted Patents. Except as expressly admitted herein, Apple denies 14 each remaining allegation set forth in Paragraph 3.

4. Apple admits that the Complaint purports to seek the relief stated in Paragraph 4.
 Except as expressly admitted herein, Apple denies each and every allegation contained in
 Paragraph 4. Apple specifically denies that the Plaintiffs are entitled to any of the relief requested
 in the Complaint.

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#### JURISDICTION AND VENUE

5. Apple admits that the Plaintiffs purport to bring a patent infringement action
pursuant to Title 35 of the United States Code, 35 U.S.C. § 101 *et seq.*, and that this Court has
subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338. Except as
expressly admitted herein, Apple denies each remaining allegation set forth in Paragraph 5.

6. Apple admits that it has a principal place of business in Cupertino, California, that
it has conducted business in this District, and that it is subject to personal jurisdiction in this
Court. Except as expressly admitted herein, Apple denies each and every allegation set forth in
Paragraph 6.

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Appi f Inc 's Answer to Compi aint

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1	7. Apple admits that it resides in this district, has a place of business in this district,		
2	and venue is proper in the district. Except as expressly admitted herein, Apple denies each		
3	remaining allegation set forth in Paragraph 7.		
4	INTRADISTRICT ASSIGNMENT		
5	8. Paragraph 8 states the case assignment rule for patent actions set forth in Civil		
6	Local Rule 3-2(c), to which no response is required.		
7	THE PARTIES		
8	A. Plaintiffs OpenTV, Inc. and Nagravision, SA		
9	9. Apple is without knowledge or information sufficient to form a belief as to the		
10	truth of the allegations in Paragraph 9 and on that basis denies each and every allegation		
11	contained therein.		
12	10. Apple is without knowledge or information sufficient to form a belief as to the		
13	truth of the allegations in Paragraph 10 and on that basis denies each and every allegation		
14	contained therein.		
15	11. Apple is without knowledge or information sufficient to form a belief as to the		
16	truth of the allegations in Paragraph 11 and on that basis denies each and every allegation		
17	contained therein.		
18	12. Apple is without knowledge or information sufficient to form a belief as to the		
19	truth of the allegations in Paragraph 12 and on that basis denies each and every allegation		
20	contained therein.		
21	13. Apple is without knowledge or information sufficient to form a belief as to the		
22	truth of the allegations in Paragraph 13 and on that basis denies each and every allegation		
23	contained therein.		
24	14. Apple is without knowledge or information sufficient to form a belief as to the		
25	truth of the allegations in Paragraph 14 and on that basis denies each and every allegation		
26	contained therein.		
27			
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1	15. Apple is without knowledge or information sufficient to form a belief as to the				
2	truth of the allegations in Paragraph 15 and on that basis denies each and every allegation				
3	contained therein.				
4	16. Apple is without knowledge or information sufficient to form a belief as to the				
5	truth of the allegations in Paragraph 16 and on that basis denies each and every allegation				
6	contained therein.				
7	17. Apple is without knowledge or information sufficient to form a belief as to the				
8	truth of the allegations in Paragraph 17 and on that basis denies each and every allegation				
9	contained therein.				
10	18. Apple is without knowledge or information sufficient to form a belief as to the				
11	truth of the allegations in Paragraph 18 and on that basis denies each and every allegation				
12	contained therein.				
13	19. Apple is without knowledge or information sufficient to form a belief as to the				
14	truth of the allegations in Paragraph 19 and on that basis denies each and every allegation				
15	contained therein.				
16	20. Apple is without knowledge or information sufficient to form a belief as to the				
17	truth of the allegations in Paragraph 20 and on that basis denies each and every allegation				
18	contained therein.				
19	21. Apple is without knowledge or information sufficient to form a belief as to the				
20	truth of the allegations in Paragraph 21 and on that basis denies each and every allegation				
21	contained therein.				
22	22. Apple is without knowledge or information sufficient to form a belief as to the				
23	truth of the allegations in Paragraph 22 and on that basis denies each and every allegation				
24	contained therein.				
25	23. Apple is without knowledge or information sufficient to form a belief as to the				
26	truth of the allegations in Paragraph 23 and on that basis denies each and every allegation				
27	contained therein.				
28	Addie Inc.'s Answer to Complaint				

1	24. Apple is without knowledge or information sufficient to form a belief as to the				
2	truth of the allegations in Paragraph 24 and on that basis denies each and every allegation				
3	contained therein.				
4	25. Apple is without knowledge or information sufficient to form a belief as to the				
5	truth of the allegations in Paragraph 25 and on that basis denies each and every allegation				
6	contained therein.				
7	26. Apple is without knowledge or information sufficient to form a belief as to the				
8	truth of the allegations in Paragraph 26 and on that basis denies each and every allegation				
9	contained therein.				
10	27. Apple is without knowledge or information sufficient to form a belief as to the				
11	truth of the allegations in Paragraph 27 and on that basis denies each and every allegation				
12	contained therein.				
13	28. Apple is without knowledge or information sufficient to form a belief as to the				
14	truth of the allegations in Paragraph 28 and on that basis denies each and every allegation				
15	contained therein.				
16	29. Apple is without knowledge or information sufficient to form a belief as to the				
17	truth of the allegations in Paragraph 29 and on that basis denies each and every allegation				
18	contained therein.				
19	30. Apple is without knowledge or information sufficient to form a belief as to the				
20	truth of the allegations in Paragraph 30 and on that basis denies each and every allegation				
21	contained therein.				
22	31. Apple is without knowledge or information sufficient to form a belief as to the				
23	truth of the allegations in Paragraph 31 and on that basis denies each and every allegation				
24	contained therein.				
25	32. Apple is without knowledge or information sufficient to form a belief as to the				
26	truth of the allegations in Paragraph 32 and on that basis denies each and every allegation				
27	contained therein.				
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