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19 **APPLE INC.**

20 **UNITED STATES DISTRICT COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **SAN JOSE**

23 OPENTV, INC., NAGRAVISION, S.A., and
24 NAGRA FRANCE S.A.S.

25 *Plaintiffs,*

26 v.

27 APPLE INC.,

28 *Defendant.*

Case No. 5:15-cv-02008-EJD

**DEFENDANT APPLE INC.'S ANSWER
TO COMPLAINT AND
COUNTERCLAIMS**

Case Filed: May 5, 2015

Judge: Honorable Edward J. Davila

Defendant Apple Inc. ("Apple"), by and through its undersigned attorneys, responds to the Complaint for Patent Infringement (the "Complaint") filed by Plaintiffs OpenTV, Inc. ("OpenTV") Nagravision, S.A. ("Nagravision"), and Nagra France S.A.S. (collectively, the "Plaintiffs") on May 5, 2015, as follows:

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

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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