IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:18-cv-01173-STV

REALTIME ADAPTIVE STREAMING LLC,

     Plaintiff,

v.

ADVANCED MICRO DEVICES, INC.,

     Defendant.

ANSWER

Defendant Advanced Micro Devices, Inc. ("AMD") respectfully submits its Answer in response to the Complaint for Patent Infringement (the "Complaint"), filed by Plaintiff Realtime Adaptive Streaming LLC ("Plaintiff" or "Realtime"). To the extent not specifically admitted herein, the allegations of the Complaint are denied.

PARTIES

1.   Answering Paragraph 1, AMD is without knowledge or information sufficient to form a belief as to the truth of the allegations set forth therein, and on that basis denies them.

2.   Answering Paragraph 2, AMD admits that it is a Delaware corporation, with its principal executive offices at 2485 Augustine Dr., Santa Clara, CA 95054. AMD further admits that it has an office in Colorado at 2950 East Harmony Rd., Suite 300, Fort Collins, CO 80528. AMD further admits that its registered agent for service of process in Colorado is The Corporation Company, 7700 E. Arapahoe Road, Suite 220, Centennial, Colorado 80112-1268.

AMD further admits that it offers certain products and/or services in Colorado and in this District.

AMD denies any remaining allegations of Paragraph 2.

JURISDICTION AND VENUE

3.   Answering Paragraph 3, AMD admits that the Complaint purports to be an action

arising under the patent laws of the United States, Title 35 of the United States Code, but denies

that Realtime's claims have any factual or legal basis. AMD admits that this Court would have

subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) to the

extent the Complaint purports to state claims for patent infringement arising under the patent

laws of the United States, Title 35 of the United States Code.

4.   Answering Paragraph 4, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. AMD denies any remaining allegations

in Paragraph 4 and specifically denies that it has committed acts of infringement within this

District or elsewhere.

5.   Answering Paragraph 5, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any allegations

of fact, AMD admits that it is registered to do business in Colorado. AMD denies any remaining

allegations in Paragraph 5, and specifically denies that it has committed acts of infringement

within this District or elsewhere and denies that venue is proper or convenient.

THE PATENTS-IN-SUIT

6.   Answering Paragraph 6, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any

allegations of fact, AMD admits that the Complaint purports to arise under 35 U.S.C § 271,

but denies that AMD has committed acts of infringement within this District or elsewhere. AMD is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 6, and on that basis denies them.

7.   Answering Paragraph 7, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD admits that Realtime purports to attach a copy of the '046 patent to the Complaint as Exhibit A. AMD is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 7, and on that basis denies them.

8.   Answering Paragraph 8, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD admits that Realtime purports to attach a copy of the '535 patent to the Complaint as Exhibit B. AMD is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 8, and on that basis denies them.

9.   Answering Paragraph 9, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD admits that Realtime purports to attach a copy of the '477 patent to the Complaint as Exhibit C. AMD is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 9, and on that basis denies them.

<u>COUNT I</u>

<u>INFRINGEMENT OF U.S. PATENT NO. 7,386,046</u>

10.   AMD incorporates each of its responses to Paragraphs 1-9 as though fully set forth herein.

11.   Answering Paragraph 11, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD admits that a document available at http://developer.amd.com/wordpress/media/2013/11/MediaSDK_User_Guide_1_1_Beta.pdf includes the statement "Fixed-function hardware accelerator that supports H.264 AVC, and SVC encoding." AMD denies any remaining allegations in Paragraph 11, and specifically denies that it has committed acts of infringement within this District or elsewhere.

12.   Answering Paragraph 12, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD denies any such remaining allegations in Paragraph 12, and specifically denies that it has committed acts of infringement within this District or elsewhere.

13.   Answering Paragraph 13, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD denies any such remaining allegations in Paragraph 13, and specifically denies that it has committed acts of infringement within this District or elsewhere.

14.   Answering Paragraph 14, the allegations constitute conclusions of law as opposed to allegations of fact, and as such, no answer is required. To the extent there are any allegations of fact, AMD admits that a document available at http://developer.amd.com/wordpress/media/

2013/11/MediaSDK_User_Guide_1_1_Beta.pdf includes the statement "Fixed-function

hardware accelerator that supports H.264 AVC, and SVC encoding." AMD is without

knowledge or information sufficient to form a belief as to the truth of the any remaining

allegations in Paragraph 14, and on that basis denies them.

   15. Answering Paragraph 15, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any allegations

of fact, AMD is without knowledge or information sufficient to form a belief as to the truth of

the allegations set forth therein, and on that basis denies them.

   16. Answering Paragraph 16, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any allegations

of fact, AMD is without knowledge or information sufficient to form a belief as to the truth of

the allegations set forth therein, and on that basis denies them.

   17. Answering Paragraph 17, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any allegations

of fact, AMD is without knowledge or information sufficient to form a belief as to the truth of

the allegations set forth therein, and on that basis denies them.

   18. Answering Paragraph 18, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any allegations

of fact, AMD is without knowledge or information sufficient to form a belief as to the truth of

the allegations set forth therein, and on that basis denies them.

   19. Answering Paragraph 19, the allegations constitute conclusions of law as opposed

to allegations of fact, and as such, no answer is required. To the extent there are any allegations

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