

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC,  
Petitioner

v.

REALTIME ADAPTIVE STREAMING LLC,  
Patent Owner

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Case IPR2019-01035  
Patent 9,769,477

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**PATENT OWNER'S RESPONSE**

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## EXHIBIT LIST

Pursuant to 37 C.F.R. § 42.63(e), Patent Owner Realtime Adaptive Streaming, LLC hereby submits its exhibit list associated with the above-captioned *inter partes* review of U.S. Patent No. 9,769,477.

<b>Exhibit No.</b>	<b>Description</b>
<b>2007</b>	Declaration of Kenneth A. Zeger, Ph.D., in Support of Patent Owner's Response
<b>2008</b>	Transcript of February 18, 2020 Deposition of Dr. Jeffrey J. Rodriguez
<b>2009</b>	ITU-T Rec. H.262 (1995 E) (Information Technology – Generic Coding of Moving Pictures and Associated Audio Information)
<b>2010</b>	ITU-T Rec. H.263 (03/96) (Video Coding for Low Bit Rate Communication)
<b>2011</b>	Cote et al., H.263+: Video Coding at Low Bit Rates (IEEE Transactions on Circuits and Systems for Video Technology, Vol. 8, No. 7, November 1998)
<b>2012</b>	Wiegand & Marpe, Context-Based Adaptive Binary Arithmetic Coding in the H.264/AVC Video Compression Standard (IEEE Transactions on Circuits and Systems for Video Technology, 2003)

## I. Introduction

Patent Owner Realtime Adaptive Streaming, LLC (“Realtime” or “Patent Owner”) submits this response to the Petition (Paper 1) filed by Google LLC (“Google” or “Petitioner”) requesting *inter partes* review (“IPR”) of claims 1, 3, 4, 7, 9, 16, 17, 20, 21, and 22 of U.S. Patent No. 9,769,477 (Ex. 1001, the “’477 Patent”). The Board granted institution on all challenged claims on the two asserted grounds of unpatentability constituting (1) anticipation based on U.S. Patent No. 7,143,432 (“Brooks”) (Ex. 1006); and (2) an obviousness combination comprising Brooks and U.S. Provisional Patent Application 60/157,468 (“’468 Application”) (Ex. 1007). *See* Paper 10 (Institution Decision). Patent Owner respectfully submits that the arguments presented herein and the additional evidence submitted herewith, such as the testimony from Patent Owner’s expert witness Kenneth A. Zeger (*see, e.g.,* Ex. 2007, Declaration of Kenneth A. Zeger Ph.D., “Zeger Decl.”), demonstrate that the challenged claims are not anticipated Brooks, or rendered obvious by Brooks in view of the ’468 Application.

## II. Summary of Argument

As discussed in this Patent Owner’s Response, each of Petitioner’s two grounds fail:

- **Ground 1:** The Petition fails to show that Brooks anticipates challenged claims 1, 3, 4, 7, 9, 16, 17, 20, 21, and 22. The Petition’s theory against independent claim 1 asserts that Brooks teaches a plurality of asymmetric

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