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12 Attorneys for GOOGLE LLC AND  
13 YOUTUBE, LLC

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
16

17 REALTIME ADAPTIVE  
18 STREAMING LLC,

19 Plaintiff,

20 vs.

21 GOOGLE LLC, and YOUTUBE, LLC,

22 Defendants.  
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Case No. 2:18-cv-03629-GW-JC

**DEFENDANTS' INVALIDITY  
CONTENTIONS**

DEFENDANTS' INVALIDITY CONTENTIONS

Realtime Adaptive Streaming LLC  
Exhibit 2001  
IPR2019-01035

1           **C. Patent L.R. 3-4(c) and 3-4(e)**

2           Google incorporates by reference, as if fully set forth herein, the documents  
3 Realtime produced at Bates range RAS-GYT\_00004421 – RAS-GYT\_00006140, as  
4 agreements that Google may contend are comparable to a license that would result  
5 from a hypothetical reasonable royalty negotiation, and agreements that Google may  
6 use to support its damages case. As discovery proceeds, Google reserves the right to  
7 identify additional agreements that are comparable to a license that would result  
8 from a hypothetical reasonable royalty or that Google may use to support its  
9 damages case.<sup>5</sup> Google will supplement its document production if it later finds  
10 additional responsive documents.

11           **D. Patent L.R. 3-4(d)**

12           Google’s document production includes documents sufficient to show the  
13 sales, revenue, cost, and profits for the instrumentalities identified by Realtime in its  
14 Patent L.R. 3-1(b) contentions. These documents are contained in Bates range  
15 GOOG-RAS-00000306 - GOOG-RAS-00000310. Based on its investigation to  
16 date, Google states that there are no revenues or profits associated with Google Duo.

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DATED: January 18, 2018

MUNGER, TOLLES & OLSON LLP

By:           /s/ Zachary Briers            
      ZACHARY M. BRIERS  
      Attorneys for GOOGLE LLC AND  
      YOUTUBE, LLC

<sup>5</sup> The parties agreed to not exchange Damages Contentions pursuant to the Northern District of California Patent Local Rules 3-8 and 3-9.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2018, I served the foregoing Infringement Contentions with all attachments and exhibits upon Realtime Adaptive Streaming LLC’s counsel of record by electronic mail.

Dated: January 18, 2018, 2018

\_\_\_\_\_  
Zachary Briers

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CERTIFICATE OF SERVICE

**Attachment 1. Identification of Prior Art Anticipating or Rendering Obvious The Asserted Claims of the**

Google contends that the following prior art references anticipate and/or render obvious each of the Asserted Claims of the Fallon Patents, U.S. Patent Nos. 7,386,046, 8,934,535, and 9,769,477, as indicated in the chart below. Where Google contends that a reference anticipates an Asserted Claim, Google contends that the reference discloses, explicitly or inherently, a limitation of the Asserted Claim, as explained more fully in the associated claim chart identified in the chart below. Where Google contends that a reference renders an Asserted Claim obvious, Google contends that the subject matter of that Asserted Claim would have been obvious to a person having ordinary skill in the art, at the time of the purported invention, given the difference between the subject matter of the Asserted Claim and the disclosure of that reference alone or the disclosure of that reference combined with other references as explained more fully in the associated claim chart. Google's contention in the Claim Chart Exhibits that a reference discloses a limitation also means that Google contends that the reference renders that limitation obvious alone, in the knowledge of a person of ordinary skill in the art, and in combination with other references.<sup>1</sup>

Prior Art Reference	Short Name	Patent(s)/Exhibit(s)
U.S. Patent No. 4,956,808 to Aakre ("Aakre")	Aakre	'535: Ex. 1 '477: Ex. 1
U.S. Patent No. 5,495,291 to Adams ("Adams")	Adams	'535: Ex. 1 '477: Ex. 1
U.S. Patent No. 5,838,823 to Ancessi ("Ancessi")	Ancessi	'046: Ex. 1 '535: Ex. 1 '477: Ex. 1
U.S. Patent No. 6,021,198 to Anigbogu ("Anigbogu")	Anigbogu	'046: Ex. 1 '535: Ex. 1 '477: Ex. 1

<sup>1</sup> The date of issue and/or date of publication of each reference is disclosed herein and/or in the corresponding Claim Chart Exhibits.

Prior Art Reference	Short Name	Patent(s)
U.S. Patent No. 6,731,812 to Bailleul ("Bailleul")	Bailleul	'046: E '535: E '477: E
Bell, Better OPM/L Text Compression, 34.12 IEEE Transactions on Communications 1176 (Dec. 1986) ("Bell")	Bell	'535: E '477: E
U.S. Patent No. 6,198,850 to Banton ("Banton")	Banton	'535: E '477: E
The Bay Area Research Wireless Access Network ("BARWAN")	BARWAN	'046: E
European Patent Publication EP1024638A1 ("Beyda") (and U.S. Patent No. 7,023,839 to Shaffer et al.)	Beyda	'046: E '535: E '477: E
U.S. Patent No. 4,568,983 to Bobick ("Bobick")	Bobick	'535: E '477: E
Bocheck, Paul, et al. "Utility-Based Network Adaptation for MPEG-4 Systems." Network and Operating System Support for Digital Audio and Video (NOSSDAV), June 1999. ("Bocheck")	Bocheck	'046: E '535: E '477: E
U.S. Patent No. 6,859,496 to Boroczky et al. ("Boroczky")	Boroczky	'535: E '477: E
U.S. Patent No. 7,143,432 to Brooks ("Brooks")	Brooks	'535: E '477: E

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