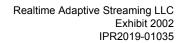
1 2 3 4 5 6 7 8 9	TED DANE (SBN 143195) ted.dane@mto.com PETER E. GRATZINGER (SBN 228764) peter.gratzinger@mto.com ZACHARY M. BRIERS (SBN 287984) zachary.briers@mto.com MUNGER, TOLLES & OLSON LLP 350 South Grand Avenue Fiftieth Floor Los Angeles, California 90071-3426 Telephone: (213) 683-9100 Facsimile: (213) 687-3702 Attorneys for Google LLC and YouTube		
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13	CENTRAL DISTRICT OF CAL	IFORNIA, WESTERN DIVISION	
14			
15	REALTIME ADAPTIVE STREAMING LLC,	Case No. 2:18-CV-03629-GW-JC	
16	Plaintiff,	DEFENDANTS' PRELIMINARY	
17	VS.	ELECTION OF ASSERTED PRIOR ART	
18	GOOGLE LLC, and YOUTUBE, LLC,		
19	Defendants.		
20	Detendants.		
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	GOOGLE'S ELECTION OF PRIOR ART	2:18-CV-03629-GW-J0	
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Defendants Google LLC and YouTube, LLC (collectively "Google") elect to assert the prior art references listed below. Google hereby incorporates by reference the objections, statements and reservations of rights made in its Invalidity Contentions regarding the deficiencies in Plaintiff Realtime Adaptive Streaming LLC's ("Realtime") infringement contentions. In particular, Google notes that Realtime's infringement contentions fail to identify "the priority date to which each asserted claim allegedly is entitled," N.D. Cal. Patent L.R. 3-1(f), stating only that each of the asserted claims is "entitled to priority dates *at least as early as*" the filing date of the first related patent application. *See* Invalidity Contentions at 3. In the event that Realtime makes arguments or produces evidence in support of conception and reduction to practice dates earlier than the effective filing dates shown on the face of the Asserted Patents, Google reserves the right to rely on earlier versions of the references listed below, or to modify its elected prior art references. Google further reserves the right to assert alternative references in Amended Invalidity Contentions in accordance with N.D. Cal. Patent L.R. 3-6.

Pursuant to the Court's October 25, 2018 Scheduling Order (ECF No. 36),

Google reserves the right to rely on any prior art references disclosed pursuant to N.D. Cal. Patent L.R. 3-4 and any admissions regarding the prior art or state of the art made in the Asserted Patents themselves for purposes of any tutorial, background explanation of the technology at issue, to show the state of the art relating to the inventions claimed in the Asserted Patents, including any motivation to combine the prior art, or to rebut any denial by Realtime that one or more claim elements were known in the prior art.

A. The Fallon Patents

Google elects to assert the following prior art references with respect to U.S. Patent Nos. 8,934,535 ("the '535 patent"); 7,386,046 ("the '046 patent); and 9,769,477 ("the '477 patent" and, collectively, "the Fallon patents").

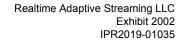
1. Anigbogu ('535, '477, '046)

GOOGLE'S ELECTION OF PRIOR ART -

2:18-CV-03629-GW-JC

DOCKET A L A R M Realtime Adaptive Streaming LLC Exhibit 2002 IPR2019-01035

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2. Beyda ('477, '046)
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 2
             3. Bocheck ('535, '477, '046)
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             4. Brooks ('535, '477)
             5. Chu ('535)
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             6. Couwenhoven ('046)
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             7. Dvir ('535, '477)
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             8. Dye ('535)
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             9. Franaszek ('477)
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             10.Gao-Takahashi System ('477, '046)
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             11.Hsu ('535)
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             12.H.263 ('477)
12
             13.Imai ('535, '477, '046)
13
             14.Ishii ('535)
14
             15. Microsoft NetMeeting System ('535, '477, '046)
15
             16.Pauls ('535, '477, '046)
16
             17.Pian ('046)
17
             18. Rynderman ('046)
18
             19.Su ('535, '046)
19
             20. Voois ('477, '046)
          B.
                The '777 Patent
20
21
          Google elects to assert the following prior art references with respect to U.S.
    Patent No. RE46,777 ("the '777 patent").
22
23
             1. Carlson
24
             2. Henry
             3. Keesman
25
26
             4. Mitsubishi System
27
             5. Ramchandran
28
             6. Sullivan & Wiegand
    GOOGLE'S ELECTION OF PRIOR ART
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                                                                       2:18-CV-03629-GW-JC
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1	7. Sugiyama			
2	8. Syu			
3	9. Wen			
4	10.Winger			
5	C. The '298 Patent	6.11	ti	
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9	2. Cowan			
10	3. H.264 Standard			
11	4. JVT-AF11r2			
12	5. Karppinen			
13	6. Lei			
14	7. Mashitani			
15	8. Tian			
16	9. RealD System			
17	10.Suh II			
18				
19	DATED, Eshavor 9, 2010	MINISTR TOLL		
20	DATED: February 8, 2019	MUNGER, TOLLE TED DANE	ES & OLSON LLP	
21		PETER A. DE		
22		PETER E. GR ZACHARY M		
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25			ary M. Briers	
26	ZACHARY M. BRIERS Attorneys for Defendants Google LLC and			
27		YouTube, LLC	anni Googie LLO uiu	
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	GOOGLE'S ELECTION OF PRIOR ART	-3-	2:18-CV-03629-GW-JC	

Realtime Adaptive Streaming LLC Exhibit 2002 IPR2019-01035

