

**UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

**Before The Honorable Cameron R. Elliot  
Administrative Law Judge**

**In the Matter of**

**CERTAIN ELECTRONIC DEVICES,  
INCLUDING STREAMING PLAYERS,  
TELEVISIONS, SET TOP BOXES,  
REMOTE CONTROLLERS, AND  
COMPONENTS THEREOF**

**Investigation No. 337-TA-1200**

**RESPONSE OF RESPONDENT ROKU, INC. TO THE  
COMPLAINT OF UNIVERSAL ELECTRONICS INC.  
AND NOTICE OF INVESTIGATION**

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Pursuant to Commission Rule 210.13, 19 C.F.R § 210.13, Respondent Roku, Inc. (“Roku”) hereby responds to the Complaint filed by Universal Electronics, Inc. (“UEI” or “Complainant”) on April 16, 2020, and to the Notice of Investigation issued by the United States International Trade Commission (“Commission”) on May 18, 2020. As to the Notice of Investigation, Roku admits that such an investigation exists and that Roku is named as one of the respondents therein. Roku otherwise denies the existence of the predicates and requirements for liability under such investigation, and therefore, denies the allegations in the Notice of Investigation to the extent such allegations exist.

As an initial matter, Roku denies that it has engaged in unfair competition or violated Section 337 of the Tariff Act of 1930, as amended, by importing, selling for importation, or selling within the United States after importation any device that infringes any valid or enforceable intellectual property right at issue in this investigation. Roku further denies that any patent claims at issue in this investigation are valid or enforceable. Roku denies that Complainant will be able to satisfy its burden to demonstrate infringement of any patent claims at issue in this Investigation. Roku further denies that a domestic industry as required by Section 337 exists or is in the process of being established. Roku denies that Complainant is entitled to any of the relief it seeks. Roku further reserves the right to amend or supplement its response based on additional facts or developments that become available or that arise after the filing of this Response. Roku responds to the Complaint by admitting only those facts expressly admitted below and denying all others averred in the Complaint.

For ease of reference, Roku has adopted the headings set forth in the Complaint. To the extent that such headings themselves contain factual or legal characterizations, however, Roku denies such characterizations. Also for ease of reference, Roku has repeated the language of the allegations and assertions from the Complaint before Roku’s answers to such allegations and

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assertions. Except as expressly admitted below, Roku denies all factual and legal characterizations in such assertions and allegations set forth in the Complaint.

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