

EXHIBIT 2

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

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

In the Matter of

**CERTAIN GRAPHICS SYSTEMS,
COMPONENTS THEREOF, AND
DIGITAL TELEVISIONS CONTAINING
THE SAME**

Investigation No. 337-TA-1318

**RESPONSE OF RESPONDENT REALTEK SEMICONDUCTOR CORP. TO THE
COMPLAINT OF COMPLAINANTS ADVANCED MICRO DEVICES, INC. AND ATI
TECHNOLOGIES ULC AND THE COMMISSION'S NOTICE OF INVESTIGATION**

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Pursuant to Commission Rule 210.13 (19 C.F.R. § 210.13), Respondent Realtek Semiconductor Corp. (“Realtek”), by and through counsel, hereby responds as follows to the Complaint under Section 337 of the Tariff Act of 1930, as amended (the “Complaint”), filed by Complainants Advanced Micro Devices, Inc. and ATI Technologies ULC (“AMD” or “Complainant”) on May 5, 2022, and the Notice of Investigation issued on June 1, 2022 (87 Fed. Reg. 34718 (June 7, 2022)). Realtek responds to allegations concerning Realtek only and the specific Realtek entity identified above. Realtek denies each and every allegation in the Complaint and Notice of Investigation except as specifically admitted herein. The responses below reflect only the current status of Realtek’s knowledge and belief regarding the subject matter of the allegations after a reasonable investigation was conducted.

As an initial matter, Realtek 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 devices, products, or articles that infringe any valid and enforceable patent in this Investigation. Moreover, Realtek contends that AMD lacked the required factual, legal, and evidentiary basis for its infringement allegations against Realtek when filing its Complaint, that AMD continues to lack an adequate factual, legal, and evidentiary basis for maintaining its infringement claims against Realtek, and that AMD therefore has violated Commission Rule 210.4(c). Realtek further avers that no industry exists in the United States as required by 19 U.S.C. § 1337(a)(3), and therefore denies the allegations that any such industry exists.

These responses are subject to additional or different information that may be discovered during the course of this Investigation. Realtek reserves the right to take additional and/or modified positions, or raise additional defenses, after this Response is submitted.

Pursuant to Rule 210.13(b), Realtek states that it does not have available statistical data regarding the quantity and value of imports of the involved article. Realtek specifically denies that any of the information or data it might ultimately supply (if any) regarding imports relate to or support any allegations of patent infringement against Realtek or any violation of 19 U.S.C. § 1337.

Except as otherwise noted, the following headings and numbered paragraphs correspond to those set forth in the Complaint. Realtek does not admit the truth of any allegation contained in those headings.

I. INTRODUCTION

1. Realtek admits that AMD filed the Complaint to institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”). Realtek denies that it has violated or is violating Section 337. Realtek further denies that its graphics systems directly infringe, contributorily infringe, or induce others to infringe the asserted claims of U.S. Patent Nos. 7,742,053 (“the ’053 Patent”), U.S. Patent No. 8,760,454 (“the ’454 Patent”), U.S. Patent No. 11,184,628 (“the ’628 Patent”), U.S. Patent No. 8,468,547 (“the ’547 Patent”), and U.S. Patent No. 8,854,381 (“the ’381 Patent”) (collectively, the “Asserted Patents”). To the extent Paragraph 1 of the Complaint contains allegations that do not pertain to Realtek, Realtek lacks sufficient knowledge or information to form a belief as to the truth of such allegations and therefore denies them.

2. Realtek admits that Paragraph 2 of the Complaint lists the proposed Respondents. Realtek denies any allegation that it has acted unlawfully, and further denies any allegation in Paragraph 2 of the Complaint directed to Realtek. Realtek denies that it directly infringes, contributorily infringes, or induces others to infringe the asserted claims of the Asserted Patents. To the extent Paragraph 2 of the Complaint contains allegations directed to an entity other than

Realtek, no response is required. To the extent a further response is required, Realtek lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 2 of the Complaint and, on that basis, denies them.

3. Realtek denies that any of its products infringe any valid and enforceable claim of the Asserted Patents. To the extent Paragraph 3 of the Complaint contains allegations directed to an entity other than Realtek, no response is required. To the extent a further response is required, Realtek lacks sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 3 of the Complaint and, on that basis, denies them.

4. Realtek admits that Paragraph 4 of the Complaint identifies categories of Accused Products. Realtek denies that any of its products infringe any valid and enforceable claim of the Asserted Patents. To the extent Paragraph 4 of the Complaint contains allegations directed to an entity other than Realtek, no response is required. To the extent a further response is required, Realtek lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 4 of the Complaint and, on that basis, denies them.

5. Realtek admits that Paragraph 5 of the Complaint identifies Asserted Claims of the Asserted Patents. Realtek denies that any of its products infringe any valid and enforceable claim of the Asserted Patents. To the extent Paragraph 5 of the Complaint contains allegations directed to an entity other than Realtek, no response is required. To the extent a further response is required, Realtek lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 5 of the Complaint and, on that basis, denies them.

6. Denied.

7. Realtek lacks sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 7 of the Complaint, and on that basis, denies them.

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