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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ADVANCED CODING TECHNOLOGIES LLC, **Plaintiff,** **v,** **GOOGLE LLC,** **Defendant.**	**CIVIL ACTION NO. 2:24-cv-00353-JRG** **Jury Trial Demanded** [redacted]

DEFENDANT GOOGLE LLC'S ANSWER TO
SECOND AMENDED COMPLAINT

Defendant Google LLC ("Google") hereby answers the Second Amended Complaint for Patent Infringement of Plaintiff Advanced Coding Technologies LLC ("ACT") as follows:

THE PARTIES

1. Google is without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 1, and therefore denies them.

2. Google admits that Google LLC is a Delaware limited liability company with a principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043. Google admits that it may be served with process through its registered agent, The Corporation Service Company, at 251 Little Falls Drive, Wilmington, DE 19808. Google admits that it offers products and services throughout the United States, including in the State of Texas and in this District. Except as expressly admitted, Google denies all remaining allegations in this paragraph, and specifically denies that it has committed any acts of infringement.

JURISDICTION

3. Google admits that the Complaint purports to state an action under the patent laws of the United States. Google admits that this Court has subject matter jurisdiction over such claims under 28 U.S.C. §§ 1331 and 1338(a). To the extent that the allegations of paragraph 3 set forth legal conclusions, no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

4. Google, for purposes of this action only, does not challenge this Court's personal jurisdiction over Google. However, Google denies that it has committed acts of infringement in this District or any other district. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

5. Google admits that it is registered to do business in Texas, but denies that it has committed any acts of infringement in this District, or any other District. Google denies that venue is proper under 28 U.S.C. § 1400(b). Google also denies that this District is the most convenient venue for adjudicating ACT's claims against Google. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

6. To the extent the allegations in paragraph 6 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Google admits that it has offices in multiple countries, that it stores and organizes certain types of data, and that it serves digital content to end users around the world. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

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7. To the extent the allegations in paragraph 7 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

8. Google admits there is an Edge Network that can be used to deliver certain content. To the extent the allegations in paragraph 8 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

9. Google admits that certain of its products and services are available to users worldwide. To the extent the allegations in paragraph 9 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

10. Google admits that its Edge Network consists of Core Data Centers, Edge Points of Presence, and Edge Nodes. Google admits that content is cached on Edge Nodes. Google admits that it has Core Data Centers in the United States. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

11. To the extent the allegations in paragraph 11 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source

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of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

12. Google denies the allegations of paragraph 12.

13. Google denies the allegations of paragraph 13.

14. Google admits that at certain points in time, it has entered into Google Global Cache Service Agreements with third-party Internet Service Providers. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

15. Google admits that at certain points in time in the past, third-party Internet Service Providers have hosted Google Global Cache servers within the Eastern District of Texas, though those servers are no longer hosted in those locations. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

16. Google denies the allegations of paragraph 16.

17. Google denies the allegations of paragraph 17.

18. Google denies the allegations of paragraph 18.

19. Google denies the allegations of paragraph 19.

20. Google denies the allegations of paragraph 20.

21. Google states that it may generate revenue by delivering advertising and when users purchase digital content through Google Play Store. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

22. Google denies the allegations of paragraph 22.

23. Google denies the allegations of paragraph 23.

24. Google denies the allegations of paragraph 24.

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25. Paragraph 25 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 25.

26. Paragraph 26 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 26.

27. Paragraph 27 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 27.

28. Google admits that at certain points in time in the past, Google supported Wi-Fi services at Starbucks locations in the Eastern District of Texas, but ceased support in July 2019. To the extent the allegations in paragraph 28 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

29. Google admits that user devices supported by Google Fi have the ability to make calls and use data service nationwide using a combination of Wi-Fi networks available to users and cell towers and network infrastructure of third party carriers Sprint, T-Mobile, and U.S. Cellular. Paragraph 29 contains legal conclusions to which no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

30. Google denies the allegations of paragraph 30.

31. To the extent the allegations in paragraph 31 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately

represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

32. To the extent the allegations in paragraph 32 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Paragraph 32 contains legal conclusions to which no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

33. To the extent the allegations in paragraph 33 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Paragraph 33 contains legal conclusions to which no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

34. To the extent the allegations in paragraph 34 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

35. Google denies the allegations of paragraph 35.

36. Google admits that GCI and Direct Peering are services offered by Google that allow customers to connect to Google's network to access Google's cloud computing platform or other services. To the extent the allegations in paragraph 36 purport to describe or quote one or

more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

37. To the extent the allegations in paragraph 37 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

38. To the extent the allegations in paragraph 38 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

39. To the extent the allegations in paragraph 39 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

40. To the extent the allegations in paragraph 40 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately

represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

41. To the extent the allegations in paragraph 41 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

42. To the extent the allegations in paragraph 42 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

43. To the extent the allegations in paragraph 43 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

44. Paragraph 44 contains legal conclusions to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 44.

45. Google denies the allegations of paragraph 45.

46. To the extent the allegations in paragraph 46 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately

represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

47. To the extent the allegations in paragraph 47 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

48. Google admits that free repairs for Pixels were offered for those affected by Hurricane Florence in the Carolinas and Virginia. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

49. Paragraph 49 contains legal conclusions to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 49.

50. To the extent the allegations in paragraph 50 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

51. To the extent the allegations in paragraph 51 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Paragraph 51 contains legal conclusions to which no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

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52. To the extent the allegations in paragraph 52 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

53. To the extent the allegations in paragraph 53 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

54. To the extent the allegations in paragraph 54 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Paragraph 54 contains legal conclusions to which no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

55. Google admits that at certain points in time in the past, it leased office space in this Judicial District in Frisco, Texas. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

56. To the extent the allegations in paragraph 56 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately

represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

57. To the extent the allegations in paragraph 57 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

58. To the extent the allegations in paragraph 58 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

59. To the extent the allegations in paragraph 59 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

60. To the extent the allegations in paragraph 60 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

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61. Paragraph 61 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 61.

62. To the extent the allegations in paragraph 62 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

63. To the extent the allegations in paragraph 63 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

64. To the extent the allegations in paragraph 64 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

65. Google admits that it has an office at 500 West 2nd Street in Austin, Texas that is over 200,000 square feet. To the extent the allegations in paragraph 65 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

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66. Google admits that, as of May 2024, Google had posted job openings for locations in Texas outside of the Eastern District of Texas. Except as expressly admitted, Google denies all remaining allegations in this paragraph

67. Google admits that it has certain business entities registered in Texas. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

68. To the extent the allegations in paragraph 68 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

69. To the extent the allegations in paragraph 69 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

70. To the extent the allegations in paragraph 70 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

71. Paragraph 71 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 71.

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PATENTS-IN-SUIT

72. Google admits that, on its face, U.S. Patent No. 8,090,025 (the "'025 Patent") is entitled "Moving-Picture Coding Apparatus Method and Program, and Moving-Picture Decoding Apparatus, Method and Program" and lists an issue date of January 3, 2012 with a date for a Certificate of Correction of October 4, 2022. Google admits that Exhibit A appears to be a copy of the '025 Patent, but lacks sufficient information to verify its authenticity. Google denies that the '025 Patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in this paragraph, and therefore denies them.

73. Google admits that, on its face, U.S. Patent No. 9,986,303 (the "'303 Patent") is entitled "Video Image Coding Data Transmitter, Video Image Coding Data Transmission Method, Video Image Coding Data Receiver, and Video Image Coding Data Transmission and Reception System" and lists an issue date of May 29, 2018. Google admits that Exhibit B appears to be a copy of the '303 Patent, but lacks sufficient information to verify its authenticity. Google denies that the '303 Patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in this paragraph, and therefore denies them.

74. Google admits that, on its face, U.S. Patent No. 10,218,995 (the "'995 Patent") is entitled "Moving Picture Encoding System, Moving Picture Encoding Method, Moving Picture Encoding Program, Moving Picture Decoding System, Moving Picture Decoding Method, Moving Picture Decoding Program, Moving Picture Reencoding System, Moving Picture Reencoding Method, Moving Picture Reencoding Program" and lists an issue date of February 26, 2019. Google admits that Exhibit C appears to be a copy of the '995 Patent, but lacks sufficient

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information to verify its authenticity. Google denies that the ’995 Patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in this paragraph, and therefore denies them.

75. Google admits that, on its face, U.S. Patent No. 9,042,448 (the “’448 Patent”) is entitled “Moving Picture Encoding System, Moving Picture Encoding Method, Moving Picture Encoding Program, Moving Picture Decoding System, Moving Picture Decoding Method, Moving Picture Decoding Program, Moving Picture Reencoding System, Moving Picture Reencoding Method, and Moving Picture Reencoding Program” and lists an issue date of May 26, 2015. Google admits that Exhibit D appears to be a copy of the ’448 Patent, but lacks sufficient information to verify its authenticity. Google denies that the ’448 Patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in this paragraph, and therefore denies them.

76. Google admits that, on its face, U.S. Patent No. 8,230,101 (the “’101 Patent”) is entitled “Server Device for Media, Method for Controlling Server for Media, and Program” and lists an issue date of July 24, 2012. Google admits that Exhibit E appears to be a copy of the ’101 Patent, but lacks sufficient information to verify its authenticity. Google denies that the ’101 Patent was duly and legally issued. Google lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in this paragraph, and therefore denies them.

77. Google admits that, on its face, U.S. Patent No. 7,804,891 (the “’891 Patent”) is entitled “Device and Method for Judging Communication Quality and Program Used for the Judgment” and lists an issue date of September 28, 2010. Google admits that Exhibit F appears to be a copy of the ’891 Patent, but lacks sufficient information to verify its authenticity. Google denies that the ’891 Patent was duly and legally issued. Google lacks knowledge or information

sufficient to form a belief as to the truth of any remaining allegations in this paragraph, and therefore denies them.

78. Google lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

79. Google denies the allegations of paragraph 79.

80. Google denies the allegations of paragraph 80.

81. Google denies the allegations of paragraph 81.

82. Google denies the allegations of paragraph 82.

83. Google denies the allegations of paragraph 83.

84. Google denies the allegations of paragraph 84.

85. Google admits that it is a founding member of the Alliance for Open Media. To the extent the allegations in paragraph 85 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

86. Google admits that Matt Frost is the Chair of the AOM Steering Committee. To the extent the allegations in paragraph 86 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

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87. Google admits that Adrian Grange is the Co-Chair of the Codec Working Group, Yeping Su is the Co-Chair of the Testing Subgroup, and Debargha Mukherjee is the Co-Chair of the Incubator Subgroup. To the extent the allegations in paragraph 87 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

88. Google denies the allegations of paragraph 88 and specifically denies that it has committed acts of infringement in this District or any other district.

89. Google denies the allegations of paragraph 89.

90. Google admits that REDACTED

. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

91. Google admits that during prosecution of U.S. Patent No. 8,635,357, the Examiner cited to U.S. Patent Publication No. 2011/0075734 A1. Paragraph 91 contains a legal conclusion to which no response is required. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

92. Paragraph 92 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 92.

93. Google admits that REDACTED

REDACTED

Except as expressly admitted, Google denies all remaining allegations in this paragraph.

94. Google denies the allegations of paragraph 94.

95. Paragraph 95 contains a legal conclusion to which no response is required. To the extent a response is required, Google denies the allegations of paragraph 95.

96. Google lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and therefore denies them.

COUNT I (INFRINGEMENT OF THE '025 PATENT)

97. Google reasserts and incorporates its responses to paragraphs 1 through 96.

98. Google denies the allegations of paragraph 98.

99. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

100. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

101. To the extent the allegations in paragraph 101 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph

includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

102. To the extent the allegations in paragraph 102 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

103. To the extent the allegations in paragraph 103 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

104. To the extent the allegations in paragraph 104 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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105. To the extent the allegations in paragraph 105 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

106. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

107. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

108. To the extent the allegations in paragraph 108 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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109. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

110. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

111. To the extent the allegations in paragraph 111 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

112. To the extent the allegations in paragraph 112 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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113. To the extent the allegations in paragraph 113 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

114. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

115. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

COUNT II (INFRINGEMENT OF THE '303 PATENT)

116. Google reasserts and incorporates its responses to paragraphs 1 through 96.

117. Google denies the allegations of paragraph 117.

118. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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119. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

120. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

121. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

122. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

123. To the extent the allegations in paragraph 123 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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124. To the extent the allegations in paragraph 124 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

125. To the extent the allegations in paragraph 125 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

126. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

127. To the extent the allegations in paragraph 127 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph

includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

128. To the extent the allegations in paragraph 128 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

129. To the extent the allegations in paragraph 129 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

130. To the extent the allegations in paragraph 130 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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131. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

132. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

COUNT III (INFRINGEMENT OF THE '995 PATENT)

133. Google reasserts and incorporates its responses to paragraphs 1 through 96.

134. Google denies the allegations of paragraph 134.

135. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

136. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

137. To the extent the allegations in paragraph 137 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth

argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

138. To the extent the allegations in paragraph 138 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

139. To the extent the allegations in paragraph 139 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

140. To the extent the allegations in paragraph 140 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph

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includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

141. To the extent the allegations in paragraph 141 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

142. To the extent the allegations in paragraph 142 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

143. To the extent the allegations in paragraph 143 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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144. To the extent the allegations in paragraph 144 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

145. To the extent the allegations in paragraph 145 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

146. To the extent the allegations in paragraph 146 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

147. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required,

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Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

148. Google admits that during prosecution of U.S. Patent No. 8,635,357, the Examiner cited to U.S. Patent Publication No. 2011/0075734 A1. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

149. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

COUNT IV (INFRINGEMENT OF THE '448 PATENT)

150. Google reasserts and incorporates its responses to paragraphs 1 through 96.

151. Google denies the allegations of paragraph 151.

152. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

153. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

154. To the extent the allegations in paragraph 154 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

155. To the extent the allegations in paragraph 155 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

156. To the extent the allegations in paragraph 156 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

157. To the extent the allegations in paragraph 157 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source

of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

158. To the extent the allegations in paragraph 158 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

159. To the extent the allegations in paragraph 159 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

160. To the extent the allegations in paragraph 160 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth

argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

161. To the extent the allegations in paragraph 161 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

162. To the extent the allegations in paragraph 162 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

163. To the extent the allegations in paragraph 163 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph

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includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

164. To the extent the allegations in paragraph 164 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

165. Google admits that during prosecution of U.S. Patent No. 8,635,357, the Examiner cited to U.S. Patent Publication No. 2011/0075734 A1. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district. Except as expressly admitted, Google denies all remaining allegations in this paragraph.

166. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

COUNT V (INFRINGEMENT OF THE '101 PATENT)

167. Google reasserts and incorporates its responses to paragraphs 1 through 96.

168. Google denies the allegations of paragraph 168.

169. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

170. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

171. To the extent the allegations in paragraph 171 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

172. To the extent the allegations in paragraph 172 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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173. To the extent the allegations in paragraph 173 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

174. To the extent the allegations in paragraph 174 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

175. To the extent the allegations in paragraph 175 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

176. To the extent the allegations in paragraph 176 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source

of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

177. To the extent the allegations in paragraph 177 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

178. To the extent the allegations in paragraph 178 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

179. To the extent the allegations in paragraph 179 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth

argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

180. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

COUNT VI (INFRINGEMENT OF THE '891 PATENT)

181. Google reasserts and incorporates its responses to paragraphs 1 through 96.

182. Google denies the allegations of paragraph 182.

183. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

184. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

185. To the extent the allegations in paragraph 185 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph

[redacted]

includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

186. To the extent the allegations in paragraph 186 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

187. To the extent the allegations in paragraph 187 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

188. To the extent the allegations in paragraph 188 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

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189. To the extent the allegations in paragraph 189 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

190. To the extent the allegations in paragraph 190 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

191. To the extent the allegations in paragraph 191 purport to describe or quote one or more documents or webpages, Google states that those documents or webpages are the best source of their full content and context. Google denies the allegations to the extent they do not accurately represent the documents' or webpages' full content and context. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required, Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

192. This paragraph sets forth argument and legal conclusions to which no response is required. To the extent this paragraph includes any allegations to which a response is required,

Google denies them, and specifically denies that it has committed acts of infringement in this District or any other district.

DEMAND FOR JURY TRIAL

Google admits that Plaintiff demands a trial by jury, and Google likewise demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Google denies the underlying allegations of Plaintiff's Prayer for Relief against Google, denies that Plaintiff is entitled to any relief whatsoever, and requests that the Court deny all relief to Plaintiff, enter judgment in favor of Google, and award Google its attorneys' fees as the prevailing party in the action.

GOOGLE'S DEFENSES

Google's defenses are provided below. Google further reserves the right to amend this Answer to add defenses, including allegations of inequitable conduct, and/or any other defenses currently unknown to Google, as they become known throughout the course of discovery in this action. Assertion of a defense is not a concession that Google has the burden of proving the matter asserted.

FIRST DEFENSE – NON-INFRINGEMENT

1. Plaintiff is not entitled to any relief against Google because Google does not and has not directly or indirectly infringed, either literally or under the doctrine of equivalents, any valid and enforceable claim of the '025, '303, '995, '448, '101, and '891 Patents.

SECOND DEFENSE – INVALIDITY

2. Each and every asserted claim of the Asserted Patents is invalid for failure to meet the requirements of Title 35, United States Code, including but not limited to, 35 U.S.C. §§ 101,

[redacted]

102, 103, and/or 112 thereof, and the rules, regulations, and laws pertaining thereto, and/or obviousness type double patenting. Google incorporates by reference its Invalidity and Subject Matter Eligibility Contentions and Amended Invalidity and Subject Matter Eligibility Contentions in support of this defense.

THIRD DEFENSE – PROSECUTION HISTORY ESTOPPEL

3. Plaintiff is estopped from construing or interpreting any claims of the Asserted Patents in such a way as may cover and/or include, either literally or under the doctrine of equivalents, Google's products, processes, services, and/or activities, and/or has waived any right to do so by reason of cancellation, limitation, or abandonment of claims, admissions, arguments, amendments, and/or representations made by or on behalf of the applicants in any proceedings before the United States Patent and Trademark Office.

FOURTH DEFENSE – EQUITABLE DOCTRINES

4. Plaintiff's claims against Google regarding the Asserted Patents are barred by the equitable doctrines of waiver, estoppel, and/or acquiescence.

FIFTH DEFENSE – LIMITATION OF DAMAGES

5. The relief sought by Plaintiff is barred or limited by 35 U.S.C. §§ 286, 287, and/or 288. Plaintiff is not entitled to any damages for activities before the filing of this action. Plaintiff did not notify Google of its alleged infringement before the filing of this action.

SIXTH DEFENSE – LACK OF STANDING

6. Plaintiff lacks standing to bring this suit to the extent that Plaintiff and/or its predecessors-in-interest lacked sufficient chain of title to the Asserted Patents. In addition, Plaintiff lacks standing to bring this suit to the extent that Plaintiff lacks substantial rights to the Asserted Patents.

[redacted]

SEVENTH DEFENSE – LICENSE; PATENT EXHAUSTION

7. On information and belief, Plaintiff's claims for relief are barred in whole or in part by an express or implied license, and/or the patent exhaustion doctrine.

EIGHTH DEFENSE – NO WILLFUL INFRINGEMENT

8. Plaintiff is not entitled to a finding of willful infringement with a corresponding increase in damages under 35 U.S.C. § 284.

NINTH DEFENSE – NOT EXCEPTIONAL CASE

9. Plaintiff is not entitled to a finding that this case is exceptional warranting attorneys' fees under 35 U.S.C. § 285, or pursuant to the Court's inherent power.

TENTH DEFENSE – ENSNAREMENT

10. ACT's claims for infringement are barred by the doctrine of ensnarement.

ELEVENTH DEFENSE – FAILURE TO STATE A CLAIM

11. ACT fails to state a claim upon which relief can be granted.

TWELFTH DEFENSE – NO IRREPARABLE HARM

12. ACT is not entitled to any form of injunctive relief because ACT has not suffered and will not suffer irreparable harm due to Google's alleged infringement and has an adequate remedy at law.

REQUEST FOR RELIEF

WHEREFORE, Google respectfully requests that the Court enter judgment in its favor and against ACT as follows:

1. Enter judgment that Google does not infringe any claims of the Asserted Patents literally and/or under the doctrine of equivalents;

2. Enter judgment that the Asserted Patents are invalid;

[redacted]

3. Declare that this case is exceptional pursuant to 35 U.S.C. §285; and

4. Award Google its costs, disbursements, attorneys' fees, and such further and additional relief as is deemed appropriate by this Court.

[redacted]

Dated: February 14, 2025

/s/ *Shaun W. Hassett*

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via electronic mail on February 14, 2025.

I also hereby certify that all counsel of record who have consented to electronic service are being served with a notice of filing of this document, under seal, pursuant to L.R. CV-5(a)(7) on February 14, 2025.

/s/ Shaun W. Hassett

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

I certify that the foregoing document is authorized to be filed under seal pursuant to the Protective Order entered in this case.

/s/ Shaun W. Hassett