

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

OPENTV, INC.,	)	
	)	
Plaintiff,	)	
v.	)	
	)	C.A. No. 25-1404 (JCG)
PINTEREST, INC.,		
		JURY TRIAL DEMANDED
Defendant.		

**DEFENDANT PINTEREST INC.’S ANSWER TO COMPLAINT AND
DEFENSES**

Defendant Pinterest, Inc. (“Pinterest”), by and through its undersigned attorneys, responds to the Complaint for Patent Infringement (“Complaint”) filed by Plaintiff OpenTV, Inc. (“Plaintiff”) on November 18, 2025. (D.I. 1). To the extent not specifically admitted herein, the allegations of the Complaint are denied.

INTRODUCTION¹

1. Pinterest admits that Plaintiff purports to plead a cause of action for patent infringement. Pinterest denies it has committed acts of infringement, and denies the remaining allegations in Paragraph 1 of the Complaint.

¹ The headings and numbered paragraphs herein correspond to those set forth in the Complaint and are provided for convenience only. Pinterest denies any allegations presented in those headings.

2. Pinterest lacks either knowledge or information sufficient to form beliefs about the truth of the allegations in Paragraph 2 of the Complaint and therefore denies them.

3. Denied.

4. Pinterest denies it has committed any acts of infringement, and therefore denies that Plaintiff is entitled to damages, a permanent injunction, or attorneys' fees and costs.

THE PARTIES

5. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 5 of the Complaint and therefore denies them.

6. Pinterest admits that is a Delaware corporation with a principal place of business at 651 Brannan Street, San Francisco, California 94107.

JURISDICTION AND VENUE

7. Pinterest admits that Plaintiff purports to plead a cause of action for patent infringement. Pinterest denies that it has committed any act of patent infringement, and denies any remaining allegations of Paragraph 7 of the Complaint.

8. Pinterest admits that this Court has subject matter jurisdiction over the Complaint pursuant to 28 U.S.C. §§ 1331 and 1338, provided that standing and other

requirements are met, but denies that Plaintiff's claims are valid or sustainable. Pinterest denies any remaining allegations of Paragraph 8 of the Complaint.

9. Pinterest admits that it is a Delaware corporation and does not contest that this Court has personal jurisdiction over it solely for the purposes of this action. Plaintiff's remaining allegations are legal conclusions to which no response is required. To the extent a response is required, Pinterest denies the remaining allegations in Paragraph 9 of the Complaint, including that it has committed any acts of patent infringement in this or any other District.

10. Pinterest admits that it is a Delaware corporation and, solely for the purposes of this action, does not contest that venue is proper in this District.

FACTUAL BACKGROUND

I. OpenTV

11. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 of the Complaint and therefore denies them.

12. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 of the Complaint and therefore denies them.

13. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 of the Complaint and therefore denies them.

14. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 of the Complaint and therefore denies them.

15. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 of the Complaint and therefore denies them.

16. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 of the Complaint and therefore denies them.

17. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 of the Complaint and therefore denies them.

18. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18 of the Complaint and therefore denies them.

19. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 of the Complaint and therefore denies them.

20. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 of the Complaint and therefore denies them.

21. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 of the Complaint and therefore denies them.

22. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22 of the Complaint and therefore denies them.

23. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 of the Complaint and therefore denies them.

24. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 of the Complaint and therefore denies them.

25. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 25 of the Complaint and therefore denies them.

26. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 26 of the Complaint and therefore denies them.

27. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27 of the Complaint and therefore denies them.

28. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 of the Complaint and therefore denies them.

29. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 of the Complaint and therefore denies them.

30. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 of the Complaint and therefore denies them.

31. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 of the Complaint and therefore denies them.

32. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 of the Complaint and therefore denies them.

II. Pinterest

33. Pinterest admits that it is a Delaware corporation with a principal place of business in San Francisco, California.

34. Pinterest admits that, as of the date of this Answer, <https://help.pinterest.com/en/guide/all-about-pinterest> states: “Pinterest is a visual discovery engine for finding ideas like recipes, home and style inspiration, and more.” Pinterest admits that www.pinterest.com can be accessed via browser or from mobile applications. Pinterest’s website otherwise speaks for itself. Pinterest denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies any remaining allegations of Paragraph 34 of the Complaint.

35. Pinterest admits that its website and mobile application employ the use of “Pins” and “Boards.” Pinterest further admits that, as of the date of this Answer, <https://help.pinterest.com/en/guide/all-about-pinterest> states: “our home feed is

where you'll find Pins, people and businesses we think you'll love, based on your recent activity. We'll also show you Pins from the people and boards you choose to follow." Pinterest's website otherwise speaks for itself. Pinterest denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies any remaining allegations of Paragraph 35 of the Complaint.

A. The Importance of Video to Pinterest's Platform

36. Pinterest admits that as of the date of this Answer, <https://medium.com/pinterest-engineering/improving-gif-performance-on-pinterest-8dad74bf92f1> states: "Pinterest is one of the most image-heavy services online, and so it's crucial that we constantly work to improve the speed and quality of those images, whether static, GIF or video." Pinterest further admits the website states: ". . . we began converting GIFs to videos after building out our native video platform in 2016." Pinterest states that the article speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 36 of the Complaint.

37. Pinterest admits that as of the date of this Answer, <https://newsroom-archive.pinterest.com/introducing-new-ways-for-creators-to-build-and-grow-with-pinterest> states "Story Pins is an all new type of Pin and publishing option that gives

creators a way to tell dynamic and visual stories with videos, voiceover and image and text overlay.” Pinterest further admits that as of the date of this Answer, <https://newsroom-archive.pinterest.com/pinterest-introduces-idea-pins-globally-and-launches-new-creator-discovery-features> states: “Idea Pins are an evolution of Story Pins, with a fresh name to better match the uniqueness of a product that empowers creators to share long-lasting ideas and not ephemeral stories. Starting today, creators will have a suite of new publishing tools including, video-first features, fresh editing tools and updates to make creating Idea Pins easier and more creative.” Pinterest states that its website speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 37 of the Complaint.

38. Denied.

39. Pinterest admits that as of the date of this Answer, <https://www.businesswire.com/news/home/20220203005895/en/Pinterest-Announces-Fourth-Quarter-and-Full-Year-2021-Results> states: ““We took important steps in 2021 with the launch of our foundational technology to deliver a video-first publishing platform. And I’m proud to say that for the first time, we surpassed \$2 billion in revenue for the year — growing 52% over the previous year — and reached our first full year of GAAP profitability,” said Ben Silbermann, CEO

and co-founder, Pinterest.” Pinterest states that this article speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 39 of the Complaint.

40. Pinterest admits that as of the date of this Answer, the UK-facing webpage <https://business.pinterest.com/en-gb/blog/video-ads-pinterest-high-intent-shoppers> states: “This presents a unique opportunity for advertisers to share video content that not only grabs our users’ attention but takes them from inspiration to action.” Pinterest further admits that the UK-facing website states: “Video plays a critical role in this journey. On Pinterest, people view videos mindfully, scrolling three times slower than they do on other social platforms.” Pinterest further admits that the UK-facing website states: “When viewers are captivated by the videos they see and watch them until the end, they’re more likely to remember your brand and take action, transforming viewers into potential customers.” Pinterest admits that as of the date of this Answer, <https://newsroom-archive.pinterest.com/en-gb/mastering-the-art-of-inspirational-videos-on-pinterest> states: “In fact, 66% of Pinners say that videos add to their discovery experience more significantly than videos on other media platforms. Pinners are also 54% more likely to say that videos on Pinterest inspire them to take action.” Pinterest states that these webpages speak for themselves and denies any conclusions, characterizations, implications,

insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 40 of the Complaint.

41. Pinterest admits that as of the date of this Answer, the webpage <https://help.pinterest.com/en/article/create-a-pin-from-an-image-or-video> states “Create a video Pin” and to click “the arrow circle up icon to select a video from your computer (or drag and drop into the upload window).” Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 41 of the Complaint.

42. Pinterest admits that as of the date of this Answer, the UK-facing webpage <https://business.pinterest.com/en-gb/blog/video-ads-pinterest-high-intent-shoppers/> states: “Your ads work harder here [¶] Pinterest’s suite of full-funnel video ads is designed to cater to every stage of the purchase journey, no matter your objectives. Whether aiming to drive brand lift in the upper funnel or achieve conversions in the lower funnel, there’s a video solution to match. [¶] Video ads: Available in two formats: standard, which is the same size as a vertical Pin, and maxwidth, which covers the full width of the Pinterest mobile feed. These eye-catching videos are designed to grab attention as people scroll their feed, making them ideal for driving both awareness and consideration. [¶] Idea ads: Dive into the

world of mobile-first native storytelling. With an array of creative and interactive features at your disposal, you can either take the reins or collaborate with a creator to craft a compelling narrative via our paid partnership tool. [¶] Premiere Spotlight: Want to make a splash at the moments that matter most for your brand? By using Premiere Spotlight, our newest high-impact awareness offering designed to reach Pinners at scale, brands observed a staggering 8.2x surge in Aided Brand Awareness.⁶ [¶] Video shopping ads: Currently in beta, merchants have the opportunity to include a video clip in their product catalogue and promote the product as an ad.” Pinterest states that these webpages speak for themselves and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 42 of the Complaint.

43. Pinterest admits that as of the date of this Answer, the UK-facing webpage <https://business.pinterest.com/en-gb/blog/video-ads-pinterest-high-intent-shoppers/> states: “advertisers leveraging at least two video formats saw a notable increase in various brand metrics, from a 1.4x uplift in brand awareness and favorability to a 1.2x boost in brand recall and action intent.” Pinterest states that this webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the

admitted facts. Pinterest denies the remaining allegations in Paragraph 43 of the Complaint.

44. Denied.

45. Pinterest admits that as of the date of this Answer, <https://help.pinterest.com/en/article/video-on-pinterest>, states: “Video Pins appear in your home feed and search results. When video Pins are set to play automatically, sound may play on your desktop or mobile device. To stop video Pins from playing automatically, manage your autoplay settings,” and “Video Pins play on your desktop when at least 50% of the video Pin is on the screen. Sound may play when you open a video Pin based on your browser settings.” Pinterest states that this webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 45 of the Complaint.

46. Pinterest admits that as of the date of this Answer the webpage <https://help.pinterest.com/en/article/review-pin-specs> states “Video Pin Specs,” “File Type,” and “.MP4, .MOV, and .M4V, as well as “Video Encoding” and “H.264 or H.265”. Pinterest further admits that as of the date of this Answer the webpage <https://help.pinterest.com/en/business/article/pinterest-product-specs> states: “You can choose from several ad content formats on Pinterest, from a static image to a

multi-image collection or video. Use this ad spec guide for image dimensions, file sizes and character limits for Pinterest ads.” Pinterest states that these webpages speak for themselves and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 46 of the Complaint.

B. Pinterest’s Use of Adaptive Bitrate Streaming

47. Pinterest admits that as of the date of this Answer, <https://medium.com/pinterest-engineering/optimizing-video-playback-performance-caf55ce310d1> states: “There are external analyses showing how interruption or slowness of video loading can result in users abandoning the experience. A three second delay can cost you 13 percent of views.” Pinterest states that the article speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 47 of the Complaint.

48. Pinterest admits that as of the date of this Answer, <https://medium.com/pinterest-engineering/optimizing-video-playback-performance-caf55ce310d1> states: “To enable efficient streaming and mitigate some of the problems listed above we use adaptive bitrate streaming, which is currently the industry standard for video delivery. Two of the most popular implementations

of ABR streaming are Apple's HLS and MPEG-DASH. Both of these technologies work by encoding a source video file into multiple streams with different bitrate. Then those streams split into smaller segments with similar duration times (e.g. few seconds). The video player then seamlessly switches between the streams depending on the available bandwidth and other factors. This allows the video to still play (at a lower quality) when the signal is poor and jump to the higher quality stream when the signal strengthens." Pinterest states that the article speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 48 of the Complaint.

49. Pinterest admits that as of the date of this Answer, <https://medium.com/pinterest-engineering/improving-abr-video-performance-at-pinterest-f0ea47a6d4fc> states: "HLS is supported through iOS's AVPlayer, while DASH is supported by Android's ExoPlayer. Currently, HLS accounts for approximately 70% of video playback sessions on iOS apps, and DASH accounts for around 55% of video sessions on Android." Pinterest states that the article speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 49 of the Complaint.

50. Pinterest admits that as of the date of this Answer, <https://medium.com/pinterest-engineering/improving-abr-video-performance-at-pinterest-f0ea47a6d4fc> states: “ABR Streaming is a widely adopted protocol in the industry for delivering video content. This method involves encoding the content at multiple bitrates and resolutions, resulting in several rendition versions of the same video. During playback, players enhance the user experience by selecting the best possible quality and dynamically adjusting it based on network conditions.” Pinterest states that the article speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 50 of the Complaint.

51. Pinterest admits that as of the date of this Answer, <https://medium.com/pinterest-engineering/improving-abr-video-performance-at-pinterest-f0ea47a6d4fc> states: “ABR Streaming is a widely adopted protocol in the industry for delivering video content. This method involves encoding the content at multiple bitrates and resolutions, resulting in several rendition versions of the same video. During playback, players enhance the user experience by selecting the best possible quality and dynamically adjusting it based on network conditions. At Pinterest, we utilize HLS and DASH for video streaming on iOS and Android platforms, respectively. HLS is supported through iOS’s AVPlayer, while DASH is

supported by Android’s ExoPlayer.” Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 51 of the Complaint.

C. Optimization of the Pinterest Media Player Through Reuse of the Playback Pipeline

52. Denied.

53. Pinterest admits that <https://medium.com/google-exoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third party article unaffiliated with Pinterest, states: “ExoPlayer 2.10 improves the way decoders are reused” and describes the use of Exoplayer 2.10 generally. Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 53 of the Complaint.

54. Pinterest admits that <https://medium.com/google-exoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third party article unaffiliated with Pinterest, states: “In ExoPlayer 2.10 we’ve made changes that enable audio decoders to be reused. We’ve also enabled decoder reuse when re-preparing the player to play a different MediaSource, by allowing renderers to hold decoders when transitioning through the disabled state.” Pinterest states that the

webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 54 of the Complaint.

55. Pinterest admits that <https://medium.com/google-exoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third party article unaffiliated with Pinterest, states: “More significantly, playback startup latency can be reduced if the player is able to reuse decoders when re-preparing the player to play a different MediaSource. The systrace below shows an example where the player is being re-prepared with the same video used in the previous example. By eliminating the need to setup the decoders, startup latency is reduced from 280ms to 110ms.” Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 55 of the Complaint.

56. Pinterest admits that <https://medium.com/google-exoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third party article unaffiliated with Pinterest, states: “use a single ExoPlayer instance for all playbacks, rather than instantiating a new instance each time. This is because decoders are only reused within an ExoPlayer instance, not between them.” Pinterest states that the

webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 56 of the Complaint.

57. Denied.

58. Denied.

59. Denied.

60. Pinterest admits that Paragraph 60 of the Complaint appears to contain screenshots from the “debug” mode of the Pinterest mobile application. Pinterest states that the application speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 60 of the Complaint.

61. Denied.

62. Pinterest admits that Paragraph 62 of the Complaint appears to contain screenshots from the “debug” mode of the Pinterest mobile application. Pinterest states that the application speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 62 of the Complaint.

63. Denied.

[ALLEGED] NOTICE

64. Pinterest admits that it has had communications with the Kudelski Group entities, including OpenTV, related to intellectual property ownership and licensing. Pinterest otherwise denies the remaining allegations in Paragraph 64 of the Complaint.

65. Pinterest admits that it has been served with the Complaint, which purports to assert a claim for infringement of U.S. Patent No. 12,231,703 (the “’703 Patent”).

OPENTV’S ’703 PATENT

66. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 66 of the Complaint and therefore denies them.

67. Pinterest admits that Paragraph 67 of the Complaint states the title, named inventors, and issue date that appear on the face of the ’703 Patent. Pinterest denies the remaining allegations contained in Paragraph 67 of the Complaint.

68. Pinterest admits that the quoted language appears in the ’703 Patent. Pinterest denies the remaining allegations in Paragraph 68 of the Complaint.

69. Pinterest admits that the quoted language appears in the ’703 Patent. Pinterest states that the ’703 Patent speaks for itself and denies any conclusions,

characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 69 of the Complaint.

70. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 70 of the Complaint.

71. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 71 of the Complaint.

72. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 72 of the Complaint.

73. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions,

characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 73 of the Complaint.

74. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 74 of the Complaint.

75. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 75 of the Complaint.

76. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 76 of the Complaint.

77. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions,

characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 77 of the Complaint.

78. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 78 of the Complaint.

79. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 79 of the Complaint.

80. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 80 of the Complaint.

81. Pinterest admits that Paragraph 81 purports to provide a summary of the prosecution history of the '703 Patent. Pinterest states that the prosecution

history of the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 81 of the Complaint.

COUNT I: [ALLEGED] INFRINGEMENT OF U.S. PATENT NO. 12,231,703

82. Pinterest refers to and incorporates its responses in Paragraphs 1-81 above.

83. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in Paragraph 83 of the Complaint and therefore denies them.

84. Pinterest denies that the '703 Patent is valid or enforceable.

85. Denied.

86. Denied.

87. Pinterest admits that the quoted language appears in the '703 Patent. Pinterest states that claim 1 of the '703 Patent speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted language. Pinterest denies the remaining allegations in Paragraph 87 of the Complaint.

88. Denied.

89. Denied.

1. A method performed by a digital receiver

90. Denied.

2. receiving a selection of a new piece of content for playback during playback of a first piece of content;

91. Denied.

92. Denied.

93. Pinterest denies that the first cited webpage contains the quoted language. Pinterest admits that as of the date of this Answer, <https://help.pinterest.com/en/article/video-on-pinterest> states: “Video Pins play on your desktop when at least 50% of the video Pin is on the screen.” Pinterest further admits that as of the date of this Answer, <https://help.pinterest.com/en/business/article/promoted-video-with-autoplay> states: “[v]iewers can tap on the video to play it in a larger view, replay it, or play it with audio.” Pinterest states that the webpages speak for themselves and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 93 of the Complaint.

94. Denied.

3. in response to the receiving of the selection, transitioning to the new piece of content;

95. Denied.

96. Denied.

97. Denied.

- 4. determining whether the new piece of content is of a same content type as the first piece of content; and based on the new piece of content being the same content type as the first piece of content, determining whether to preserve at least a portion of a playback pipeline used to play back the first piece of content,**

98. Pinterest admits that as of the date of this Answer, the webpage <https://medium.com/googleexoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third-party website unaffiliated with Pinterest, contains the language that appears in the screenshot in Paragraph 98 of the Complaint. Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 98 of the Complaint.

99. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 of the Complaint and therefore denies them.

100. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100 of the Complaint and therefore denies them.

101. Pinterest admits that as of the date of this Answer, the webpage [https://medium.com/googleexoplayer/improved-decoder-reuse-in-exoplayer-](https://medium.com/googleexoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d)

ef4c6d99591d, a third-party website unaffiliated with Pinterest, contains the language that appears in the screenshot in Paragraph 101 of the Complaint. Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 101 of the Complaint.

102. Pinterest admits that as of the date of this Answer, the webpage <https://medium.com/googleexoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third-party website unaffiliated with Pinterest, contains the language that appears in the screenshot in Paragraph 102 of the Complaint. Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 102 of the Complaint.

103. Denied.

104. Denied.

105. Denied.

5. the playback pipeline comprising a source element to manage the downloading of content data for the new piece of content, a demultiplexer, an audio decoder, and a video decoder,

106. Denied.

107. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107 of the Complaint and therefore denies them.

108. Denied.

109. Denied.

110. Denied.

111. Denied.

112. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112 of the Complaint and therefore denies them.

113. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 of the Complaint and therefore denies them.

114. Denied.

115. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115 of the Complaint and therefore denies them.

116. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 116 of the Complaint and therefore denies them.

117. Pinterest lacks knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 of the Complaint and therefore denies them.

118. Denied.

119. Denied.

6. the preserving of at least the portion of the playback pipeline comprising preserving one or more of the source element, the demultiplexer, the audio decoder, or the video decoder used to obtain the first piece of content for the new piece of content.

120. Denied.

121. Denied.

122. Pinterest admits that as of the date of this Answer, the webpage <https://medium.com/googleexoplayer/improved-decoder-reuse-in-exoplayer-ef4c6d99591d>, a third-party website unaffiliated with Pinterest, contains the language that appears in the screenshot in Paragraph 122 of the Complaint. Pinterest states that the webpage speaks for itself and denies any conclusions, characterizations, implications, insinuations, or speculations that Plaintiff alleges follow from the admitted facts. Pinterest denies the remaining allegations in Paragraph 122 of the Complaint.

123. Denied.

124. Denied.

125. Paragraph 125 of the Complaint states Plaintiff's position on providing additional infringement theories, for which no response is required. To the extent a response is required, Pinterest denies of the allegations of Paragraph 125 of the Complaint.

126. Denied.

127. Denied.

128. Pinterest admits that its mobile applications are available for download on the Apple App Store at <https://apps.apple.com/us/app/pinterest/id429047995> and the Android Store at https://play.google.com/store/apps/details?id=com.pinterest&hl=en_US&pli=1.

Pinterest denies the remaining allegations of Paragraph 128 of the Complaint.

129. Denied.

130. Denied.

131. Denied

132. Denied.

133. Denied.

134. Denied.

PRAYER FOR RELIEF

135. Pinterest denies that Plaintiff is entitled to any relief from Pinterest and denies all the allegations contained in Paragraphs A-G of Plaintiff's Prayer for Relief.

DEMAND FOR JURY TRIAL

136. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and D. Del. LR 38.1, Pinterest hereby demands a trial by jury for all issues so triable.

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DEFENSES

Pinterest's Defenses are listed below. Pinterest reserves the right to amend its Answer to add additional Defenses, including allegations of inequitable conduct, consistent with the facts discovered in this case.

FIRST DEFENSE

Plaintiff's Complaint fails to state a claim upon which relief can be granted.

SECOND DEFENSE

Pinterest has not infringed and does not infringe, under any theory of infringement (including directly (whether individually or jointly) or indirectly (whether contributorily or by inducement)), any valid, enforceable claim of U.S. Patent No. 12,231,703 (the "'703 Patent" or the "Asserted Patent").

THIRD DEFENSE

Each asserted claim of the Asserted Patent is invalid for failure to comply with one or more of the requirements of the United States Code, Title 35, including without limitation, 35 U.S.C. §§ 101, 102, 103, and 112, and the rules, regulations, and laws pertaining thereto.

FOURTH DEFENSE

To the extent that Plaintiff and any predecessors in interest to the Asserted Patent failed to properly mark any of their relevant products or materials as required by 35 U.S.C. § 287, or otherwise give proper notice that Pinterest's actions allegedly infringe the Asserted Patent, Pinterest is not liable to Plaintiff for the acts alleged to

have been performed before it received actual notice that it was allegedly infringing the Asserted Patent.

FIFTH DEFENSE

To the extent that Plaintiff asserts that Pinterest indirectly infringes, either by contributory infringement or inducement of infringement, Pinterest is not liable to Plaintiff for the acts alleged to have been performed before Pinterest knew that its actions would cause indirect infringement.

SIXTH DEFENSE

Plaintiff's claims for damage are statutorily limited or barred by 35 U.S.C. § 286.

SEVENTH DEFENSE

Plaintiff has failed to state facts and/or a legal basis sufficient to permit the Court to grant equitable or injunctive relief against Pinterest.

RESERVATION OF DEFENSES

Discovery in this action has not yet commenced and Pinterest continues to investigate the allegations set forth in the Complaint. Pinterest hereby provides explicit notice to OpenTV that it intends to rely upon such other defenses as may become available by law or in equity, or pursuant to statute, as discovery proceeds in this action, and hereby reserves the right to assert such additional defenses.

PRAYER FOR RELIEF

WHEREFORE, Pinterest respectfully prays for the following relief:

- A. Dismissal of Plaintiff's Complaint with prejudice, in its entirety, and judgment on the Complaint entered in favor of Pinterest against OpenTV;
- B. A judgment that this case is exceptional and an award to Pinterest of its costs, expenses, and reasonable attorneys' fees under 35 U.S.C. § 285 and all other applicable statutes and rules in common law that would be appropriate, with pre- and post-judgment interest thereon; and
- C. That Pinterest be awarded such other and further relief as this Court may deem just and proper under the circumstances.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and D. Del. LR 38.1, Pinterest hereby demands a trial by jury for all issues so triable.

DATED: February 16, 2026

QUINN EMANUEL URQUHART &
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By /s/ Jared W. Newton

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