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Counterclaim for Revocation

In the matter of

1. Pinterest Germany GmbH, Edisonstraße 63, Haus A, 1.
 Stock, 12459 Berlin, represented by Kenneth Frederick Cush-
 man (USA) and Jacqueline Whorms Katzel (USA)

- Counterclaimant and Defendant 1 -

2. Pinterest Europe Ltd., Waterloo Exchange, Waterloo Rd,
 Ballsbridge, Dublin 4, D04 E5W7, Ireland, represented by its
 managing directors

- Counterclaimant and Defendant 2 -

3. Pinterest Inc., 651 Brannan Street, San Francisco, CA
 94107-1532, USA, represented by Board of Directors, this
 represented by the CEO

- Counterclaimant and Defendant 3 -

Case No.: New

Case No. of the main proceedings:
UPC-CFI-0001506/2025

Submission ID: 0000045104

Please see the table on p. 3 et seqq.
 for the **Formal Requirements**.

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(5) Feature group 1.5

1.5 the playback pipeline comprising

1.5.1 a source element to manage the downloading of content data for the new piece of content,

1.5.2 a demultiplexer

1.5.3 an audio decoder, and

1.5.4 a video decoder,

D 1 also discloses a playback pipeline according to feature group 1.5, comprising all elements described in features 1.5.1 to 1.5.4.

- (a) According to paragraph [0002] of D 1¹, the rendering pathway comprises all processing functions necessary to process a received flow, *e.g.*, a video, to extract and render content on the device (highlighting added):

[0002] Real time multimedia content is typically delivered over a communication network to devices for rendering. For example, the real time content may be organized into content channels that are delivered over the network. Each content channel comprises a “flow” which may include video, audio, closed captioning, overlay information and any other suitable information for rendering on a device. Rendering logic, such as multimedia players and associated hardware and software at the device operate to process the received channels, perform any necessary decoding, descrambling, filtering, transformations, and any other processes necessary to render the content at the device. For example, the rendering logic typically constructs a rendering pathway that comprises all the processing functions necessary to process a received flow to extract and render the content on the device.

Also, D 1 explicitly discloses in paragraph [0017] that content may be provided in MP4 format:

provide content to the device 102. For example, the content may be provided in a real time transport protocol (RTP) or provided as files in (MP4) format. For example, the content

¹ Also disclosed in para. [0019]: „For example, the functional elements comprise content filters, transform filters, decoders, and/or any other type of functional element needed to process the content flow of the selected channel for rendering at the device 102.“

As the Counterdefendant has alleged in the SoC (paras. 206 et seq.), it is technically unavoidable that a playback pipeline contains all elements claimed in features 1.5.1 to 1.5.4 for playing back MP4 videos. Thus, paragraph [0017] of D 1 directly and unambiguously discloses a playback pipeline according to feature group 1.5 including a source element, a demultiplexer, an audio decoder and a video decoder.

- (b) D 1 discloses these elements of the playback pipeline also separately in paragraph [0024], according to which the rendering pathway includes a source filter and a transform filter. The source filter understands the format of the transport stream and extracts media data for presentation to the transform filter. The transform filter (which can be a H.264 decoder) takes in the media data and decompresses (*i.e.*, unpacks) it before it is input to the renderer which can render video, audio, and overlays included in the content data. Thus, paragraph [0024] of D 1 discloses that the download of new content data is managed (source element), the data is unpacked (which is done by the demultiplexer according to the Counterdefendant, SoC, para. 206) and video and audio data is decoded before it is rendered (video and audio decoder; highlighting added):

[0024] A user interface 208 operates to receive user input and signals the multimedia manager 204 with channel selection requests from a user. The multimedia manager 204 provides control signals to control logic 212 of rendering logic 210. The rendering logic 210 comprises decoders and a renderer 218. The control logic 212 operates to construct a rendering pathway 220 that includes functional elements that operate to process content data associated with a selected content channel. For example, the rendering pathway 220 comprises a source filter 214 and a transform filter 216. The source filter 214 and the transform filter 216 process content data received from the multimedia manager 204. For example, the source filter 214 understands the format of the received transport stream and extracts media data for presentation to the transform filter 216. The transform filter 216 is a pluggable filter, such as an H264 decoder that takes in data from the source filter 214 and decompresses it. The processed data is then input to a renderer 218 that operates to render the content on the device. For example, the renderer 218 operates to render video, audio, and overlays that are included in the content data.