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Attorneys for Plaintiff
MASTEROBJECTS, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MASTEROBJECTS, INC.,

Plaintiff,

v.

MICROSOFT CORP.,

Defendant.

Case No. C 11-2402 EMC

**PLAINTIFF MASTEROBJECTS, INC.'S
AMENDED ANSWER TO DEFENDANT
MICROSOFT CORP.'S
COUNTERCLAIMS**

JURY TRIAL DEMANDED

1 suggesting completions and additional related terms to refine a search query, and lacking
2 knowledge or information sufficient to admit or deny the remaining allegations denies each
3 and every remaining allegation set forth in said paragraph.

4 13. Answering the allegations in Paragraph 13, MasterObjects admits that it
5 licenses QuestFields to customers for mobile use, that customers can modify their webpages
6 to include QuestFields-powered search fields, and that QuestFields can be used in connection
7 with suggesting completions and additional related terms to refine a search query, and
8 lacking knowledge or information sufficient to admit or deny the remaining allegations
9 denies each and every remaining allegation set forth in said paragraph.

11 14. Answering the allegations in Paragraph 14, MasterObjects admits that
12 MasterObjects sells an implementation of QuestFields called ProductFinder, that
13 ProductFinder enables customers to search for products in a database, that users may start
14 typing the first characters of a word in a product name to begin a query, that the QuestField
15 Server may communicate with a product database and show the first matches while the user
16 is typing, that a ProductFinder QuestField can be used in connection with a product database
17 to show product names and other metadata that is available in the database, and that users can
18 submit a value found, and that users can submit values in an input field in web applications,
19 and lacking knowledge or information sufficient to admit or deny the remaining allegations
20 denies each and every remaining allegation set forth in said paragraph.

22 15. Answering the allegations in Paragraph 15, MasterObjects admits said
23 allegations.

25 16. Answering the allegations in Paragraph 16, MasterObjects sells an
26 implementation of QuestFields called PeopleFinder QuestField, that PeopleFinder enables
27 customers to search for people information in connection with a corporate directory or a
28

1 people database, that PeopleFinder may be delivered with examples of configurations of
2 content channels that can enable the return of people information, and that PeopleFinder can
3 display information in a dropdown list in various ways, and lacking knowledge or
4 information sufficient to admit or deny the remaining allegations denies each and every
5 remaining allegation set forth in said paragraph.

6 **COUNTERCLAIM I:**

7 **DECLARATORY RELIEF REGARDING NON-INFRINGEMENT**

8
9 17. Answering the allegations in Paragraph 17, MasterObjects restates and
10 realleges its answer to Paragraphs 1 through 16 above as if set forth fully herein.

11 18. Answering the allegations in Paragraph 18, MasterObjects admits said
12 allegations.

13 19. Answering the allegations in Paragraph 19, MasterObjects admits that
14 Microsoft requests declaratory relief, but denies that Microsoft is entitled to relief and denies
15 each and every allegation remaining in said paragraph.
16

17 **COUNTERCLAIM II:**

18 **DECLARATORY RELIEF REGARDING INVALIDITY**

19 20. Answering the allegations in Paragraph 20, MasterObjects restates and
20 realleges its answer to Paragraphs 1 through 19 above as if set forth fully herein.

21 21. Answering the allegations in Paragraph 21, MasterObjects admits said
22 allegations.
23

24 22. Answering the allegations in Paragraph 22, MasterObjects admits that
25 Microsoft requests declaratory relief, but denies that Microsoft is entitled to relief and denies
26 each and every allegation remaining in said paragraph.
27
28

1 **FOURTEENTH DEFENSE**

2 **(Substantial Non-Infringing Uses)**

3
4 41. Any and all products or actions accused of infringement have substantial uses
5 that do not infringe and do not induce or contribute to the alleged infringement of the claims
6 of the '911 Patent.

7 **FIFTEENTH DEFENSE**

8 **(Dedication to the Public)**

9 42. Microsoft has dedicated to the public any method, system, and/or product
10 disclosed in the '911 patent but not literally claimed therein and is therefore estopped from
11 claiming infringement by any such public domain method, system, and/or product.
12

13 **PRAYER FOR RELIEF**

14 Answering Microsoft's Prayer for Relief, MasterObjects denies that Microsoft is
15 entitled to any of the relief it requests, including the relief Microsoft requests in its
16 paragraphs (a) – (i), and prays that Microsoft take nothing by its Counterclaims.

17 WHEREFORE, Plaintiff MasterObjects further prays for entry of judgment:

- 18 A. that the Patents-in-Suit are valid and enforceable;
19
20 B. that Microsoft has infringed one or more claims of the Patents-in-Suit;
21
22 C. that Microsoft account for and pay to Plaintiff all damages caused by the
23 infringement of the Patents-in-Suit, which by statute can be no less than a reasonable royalty;
24
25 D. that this Court issue a preliminary and final injunction enjoining Microsoft, its
26 officers, agents, servants, employees and attorneys, and any other person in active concert or
27 participation with them, from continuing the acts herein complained of, and more
28

1 particularly, that Microsoft and such other persons be permanently enjoined and restrained
2 from further infringing the instant search patent;

3 E. that MasterObjects be granted pre-judgment and post-judgment interest on the
4 damages caused to them by reason of Microsoft's infringement of the Patents-in-Suit;

5 F. that this Court require Microsoft to file with this Court, within thirty (30) days
6 after entry of final judgment, a written statement under oath setting forth in detail the manner
7 in which Defendant has complied with the injunction;

8 G. that this be adjudged an exceptional case and that MasterObjects be
9 awarded its attorney's fees in this action pursuant to 35 U.S.C. § 285;

10 H. that this Court award MasterObjects its costs and disbursements in this
11 civil action, including reasonable attorney's fees; and

12 I. that MasterObjects be granted such other and further relief as the Court
13 may deem just and proper under the current circumstances.

14 Dated: August 16, 2011

15 Respectfully submitted,

16
17 /s/George F. Bishop
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DEMAND FOR JURY TRIAL

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Plaintiff, by its undersigned attorneys, demands a trial by jury on all issues so triable.

Dated: August 16, 2011

Respectfully submitted,

/s/ George F. Bishop
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