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 13 LG Display America, Inc.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 IN RE: TFT-LCD (FLAT PANEL)
 18 ANTITRUST LITIGATION

CASE NO. 3:11-cv-02591 SI

Case No. M 07-md-01827 SI

MDL No. 1827

19 This Document Relates to Individual Case
 20 No. 3:11-cv-02591 SI:

**DEFENDANT LG DISPLAY AMERICA,
 INC.'S ANSWER TO PLAINTIFF'S
 AMENDED COMPLAINT**

21 T-MOBILE U.S.A., INC.,

22 Plaintiff,

Judge: Honorable Susan Y. Illston

23 v.

24 AU OPTRONICS CORPORATION, et al.,

25 Defendants.

1 Defendant LG Display America, Inc. (“LG Display America”) hereby answers and
2 responds to the allegations contained in T-Mobile U.S.A., Inc.’s (“Plaintiff’s”) First Amended
3 Complaint (“FAC”). LG Display America is responding to those allegations in the FAC that are
4 directed toward LG Display America. Except as otherwise stated below, LG Display America is
5 without sufficient knowledge or information to form a belief concerning the truth of the
6 allegations in the FAC that are directed toward other defendants. LG Display America denies all
7 allegations contained in the FAC (including headings and captions) not specifically admitted in
8 this Answer to the FAC (hereinafter, “Answer”).

9 1. LG Display America lacks knowledge or information sufficient to form a belief as
10 to the truth of the allegations in Paragraph 1 and on this basis denies those allegations.

11 2. The allegations contained in Paragraph 2 consist of the Plaintiff’s conclusions of
12 law, to which no response is required. To the extent that the allegations contained in Paragraph 2
13 are directed to other defendants, LG Display America lacks knowledge or information sufficient
14 to form a belief as to the truth of these allegations and on this basis denies those allegations. To
15 the extent that the allegations in Paragraph 2 are directed to LG Display America and are deemed
16 to require a response, they are denied.

17 3. The first sentence of Paragraph 3 contains Plaintiff’s characterization of its
18 terminology, to which no response is required. The second and third sentences of Paragraph 3
19 consist of the Plaintiff’s conclusions of law, to which no response is required. To the extent that
20 the allegations contained in Paragraph 3 are directed to other defendants, LG Display America
21 lacks knowledge or information sufficient to form a belief as to the truth of these allegations and
22 on this basis denies those allegations. To the extent that the allegations in Paragraph 3 are
23 directed to LG Display America and are deemed to require a response, they are denied.

24 4. LG Display America lacks knowledge or information sufficient to form a belief as
25 to the truth of the allegations in the first and second sentences of Paragraph 4 and on this basis
26 denies those allegations. The third and fourth sentences of Paragraph 4 consist of the Plaintiff’s
27 conclusions of law, to which no response is required. To the extent that the allegations contained
28 in Paragraph 4 are directed to other defendants, LG Display America lacks knowledge or

1 information sufficient to form a belief as to the truth of these allegations and on this basis denies
2 those allegations. To the extent that the allegations in Paragraph 4 are directed to LG Display
3 America and are deemed to require a response, they are denied.

4 5. To the extent that the allegations contained in Paragraph 5 are directed to other
5 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
6 the truth of the allegations contained in Paragraph 5 and on this basis denies those allegations.
7 LG Display America admits that it has entered into a plea agreement. To the extent that
8 allegations in Paragraph 5 are based on public statements or plea agreements, those statements
9 and agreements speak for themselves and no response is required.

10 6. To the extent that the allegations contained in Paragraph 6 are directed to other
11 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
12 the truth of the allegations contained in Paragraph 6 and on this basis denies those allegations. To
13 the extent that the allegations in Paragraph 6 are based on plea agreements, those agreements
14 speak for themselves and no response is required. LG Display America admits that it maintains
15 its principal place of business in San Jose, California. To the extent that the allegations in
16 Paragraph 6 are based on plea agreements, those agreements speak for themselves and no
17 response is required. To the extent that the remaining allegations in Paragraph 6 are deemed to
18 require a response and are directed to LG Display Co., Ltd. ("LG Display Co.") or LG Display
19 America, they are denied.

20 7. To the extent that the allegations contained in Paragraph 7 are directed to other
21 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
22 the truth of the allegations contained in Paragraph 7 and on this basis denies those allegations. To
23 the extent that the allegations in Paragraph 7 are directed to LG Display America and are deemed
24 to require a response, they are denied.

25 8. The allegations contained in Paragraph 8 consist of Plaintiff's conclusions of law, to
26 which no response is required. To the extent that those allegations may be deemed to require a
27 response and are directed to other defendants, LG Display America lacks knowledge or
28 information sufficient to form a belief as to the truth of the allegations, and on this basis denies

1 those allegations. To the extent that the allegations contained in Paragraph 8 may be deemed to
2 require a response and are directed to LG Display America, they are denied.

3 9. Paragraph 9 consists of Plaintiff's characterization of its claims, to which no
4 response is required.

5 10. Paragraph 10 consists of Plaintiff's characterization of its claims, to which no
6 response is required.

7 11. Paragraph 11 consists of Plaintiff's characterization of its claims, to which no
8 response is required.

9 12. Paragraph 12 consists of Plaintiff's characterization of its claims and Plaintiff's
10 conclusions of law, to which no response is required.

11 13. The allegations contained in Paragraph 13 consist of the Plaintiff's conclusions of
12 law, to which no response is required. To the extent that the allegations contained in Paragraph
13 13 are directed to other defendants, LG Display America lacks knowledge or information
14 sufficient to form a belief as to the truth of these allegations and on this basis denies those
15 allegations. To the extent that the allegations in Paragraph 13 are directed to LG Display
16 America and are deemed to require a response, they are denied.

17 14. Paragraph 14 consists of Plaintiff's conclusions of law, to which no response is
18 required.

19 15. Paragraph 15 consists of Plaintiff's conclusions of law, to which no response is
20 required.

21 16. Paragraph 16 consists of Plaintiff's conclusions of law, to which no response is
22 required.

23 17. LG Display America admits the allegations contained in the first, second, and third
24 sentences of Paragraph 17. The fourth sentence of Paragraph 17 is Plaintiff's characterization of
25 its terminology, to which no response is required.

26 18. The first sentence of Paragraph 18 consists of Plaintiff's characterization of its
27 terminology, to which no response is required. The second sentence of Paragraph 18 contains
28 Plaintiff's conclusions of law, to which no response is required.

1 19. Paragraph 19 consists of Plaintiff's characterization of its terminology, to which no
2 response is required.

3 20. Paragraph 20 consists of Plaintiff's characterization of its terminology, to which no
4 response is required.

5 21. Paragraph 21 consists of Plaintiff's characterization of its terminology, to which no
6 response is required.

7 22. LG Display America lacks knowledge or information sufficient to form a belief as
8 to the truth of the allegations in the first, second, and third sentences of Paragraph 22 and on this
9 basis denies those allegations. The fourth sentence of Paragraph 22 consists of Plaintiff's
10 conclusions of law, to which no response is required.

11 23. LG Display America lacks knowledge or information sufficient to form a belief as
12 to the truth of the allegations in the first sentence of Paragraph 23 and on this basis denies those
13 allegations. The second and third sentences of Paragraph 23 consist of Plaintiff's conclusions of
14 law, to which no response is required. The fourth sentence of Paragraph 23 consists of Plaintiff's
15 characterization of its terminology, to which no response is required.

16 24. LG Display America lacks knowledge or information sufficient to form a belief as
17 to the truth of the allegations in the first sentence of Paragraph 24 and on this basis denies those
18 allegations. The allegations in the second sentence of Paragraph 24 consist of Plaintiff's
19 conclusions of law, to which no response is required.

20 25. LG Display America lacks knowledge or information sufficient to form a belief as
21 to the truth of the allegations in Paragraph 25 and on this basis denies those allegations.

22 26. LG Display America lacks knowledge or information sufficient to form a belief as
23 to the truth of the allegations in Paragraph 26 and on this basis denies those allegations.

24 27. LG Display America lacks knowledge or information sufficient to form a belief as
25 to the truth of the allegations in Paragraph 27 and on this basis denies those allegations. To the
26 extent that the allegations contained in Paragraph 27 are directed to other defendants, LG Display
27 America lacks knowledge or information sufficient to form a belief as to the truth of these
28 allegations and on this basis denies those allegations. To the extent that the allegations in

1 Paragraph 27 are directed to LG Display America and are deemed to require a response, they are
2 denied.

3 28. LG Display America lacks knowledge or information sufficient to form a belief as
4 to the truth of the allegations in Paragraph 28 and on this basis denies those allegations.

5 29. Paragraph 29 is directed to another defendant. Accordingly, LG Display America
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
7 contained in Paragraph 29 and on this basis denies those allegations.

8 30. Paragraph 30 is directed to another defendant. Accordingly, LG Display America
9 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
10 contained in Paragraph 30 and on this basis denies those allegations.

11 31. Paragraph 31 is directed to another defendant. Accordingly, LG Display America
12 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
13 contained in Paragraph 31 and on this basis denies those allegations.

14 32. Paragraph 32 is directed to another defendant. Accordingly, LG Display America
15 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
16 contained in Paragraph 32 and on this basis denies those allegations.

17 33. Paragraph 33 is directed to another defendant. Accordingly, LG Display America
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
19 contained in Paragraph 33 and on this basis denies those allegations.

20 34. Paragraph 34 is directed to another defendant. Accordingly, LG Display America
21 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
22 contained in Paragraph 34 and on this basis denies those allegations.

23 35. Paragraph 35 is directed to another defendant. Accordingly, LG Display America
24 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
25 contained in Paragraph 35 and on this basis denies those allegations.

26 36. Paragraph 36 is directed to another defendant. Accordingly, LG Display America
27 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
28 contained in Paragraph 36 and on this basis denies those allegations.

1 37. Paragraph 37 is directed to another defendant. Accordingly, LG Display America
2 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
3 contained in Paragraph 37 and on this basis denies those allegations.

4 38. Paragraph 38 is directed to other defendants. Accordingly, LG Display America
5 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
6 contained in Paragraph 38 and on this basis denies those allegations.

7 39. Paragraph 39 is directed to another defendant. Accordingly, LG Display America
8 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
9 contained in Paragraph 39 and on this basis denies those allegations.

10 40. Paragraph 40 is directed to another defendant. Accordingly, LG Display America
11 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
12 contained in Paragraph 40 and on this basis denies those allegations.

13 41. Paragraph 41 is directed to another defendant. Accordingly, LG Display America
14 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
15 contained in Paragraph 41 and on this basis denies those allegations.

16 42. Paragraph 42 is directed to another defendant. Accordingly, LG Display America
17 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
18 contained in Paragraph 42 and on this basis denies those allegations.

19 43. Paragraph 43 is directed to another defendant. Accordingly, LG Display America
20 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
21 contained in Paragraph 43 and on this basis denies those allegations.

22 44. Paragraph 44 is directed to another defendant. Accordingly, LG Display America
23 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
24 contained in Paragraph 44 and on this basis denies those allegations.

25 45. Paragraph 45 is directed to another defendant. Accordingly, LG Display America
26 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
27 contained in Paragraph 45 and on this basis denies those allegations.

28 46. Paragraph 46 is directed to another defendant. Accordingly, LG Display America

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
2 contained in Paragraph 46 and on this basis denies those allegations.

3 47. Paragraph 47 is directed to another defendant. Accordingly, LG Display America
4 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
5 contained in Paragraph 47 and on this basis denies those allegations.

6 48. Paragraph 48 is directed to another defendant. Accordingly, LG Display America
7 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
8 contained in Paragraph 48 and on this basis denies those allegations.

9 49. Paragraph 49 is directed to another defendant. Accordingly, LG Display America
10 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 49 and on this basis denies those allegations.

12 50. Paragraph 50 is directed to another defendant. Accordingly, LG Display America
13 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
14 contained in Paragraph 50 and on this basis denies those allegations.

15 51. Paragraph 51 is directed to another defendant. Accordingly, LG Display America
16 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
17 contained in Paragraph 51 and on this basis denies those allegations.

18 52. Paragraph 52 is directed to another defendant. Accordingly, LG Display America
19 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
20 contained in Paragraph 52 and on this basis denies those allegations.

21 53. LG Display America admits that LG Display Co. was formerly known as
22 LG.Philips LCD Co., Ltd. LG Display America objects to the first sentence of Paragraph 53 to
23 the extent that the term “joint venture” is used as a legal term of art, and on that basis denies the
24 allegations contained in the first sentence of Paragraph 53. LG Display America denies the
25 allegations in the second sentence of Paragraph 53 regarding the location of LG Display Co.’s
26 principal place of business. LG Display America admits that LG Display Co. sold TFT-LCD
27 panels, but denies any allegation as to LCD Products, as LG Display Co. has never manufactured,
28 sold or distributed LCD Products. The remaining allegations contained in Paragraph 53 are

1 directed at other corporate entities, and accordingly, LG Display America lacks knowledge or
2 information sufficient to form a belief as to the truth of such allegations and on this basis denies
3 them.

4 54. LG Display America admits that LG Display Co. was formerly known as
5 LG.Philips LCD Co., Ltd. LG Display America denies the allegations in the first sentence of
6 Paragraph 54 regarding the location of its principal place of business. LG Display America
7 admits that it sold TFT-LCD panels, but denies any allegation as to LCD Products, as LG Display
8 America has never sold or distributed LCD Products. To the extent that the remaining allegations
9 in Paragraph 54 may be deemed to require a response, they are denied.

10 55. The first sentence of Paragraph 55 consists of Plaintiff's characterization of its
11 terminology, to which no response is required. The remainder of Paragraph 55 contains
12 Plaintiffs' conclusions of law, to which no response is required.

13 56. Paragraph 56 is directed to another defendant. Accordingly, LG Display America
14 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
15 contained in Paragraph 56 and on this basis denies those allegations.

16 57. LG Display America admits that LG Display Co. was formerly known as
17 LG.Philips LCD Co., Ltd. LG Display America objects to Paragraph 57 to the extent that the
18 term "joint venture" is used as a legal term of art, and on that basis denies the allegations
19 contained in Paragraph 57. To the extent the allegations in Paragraph 57 incorporate Plaintiff's
20 term "LCDs," LG Display America denies the allegations on the basis that they are vague. LG
21 Display America further denies the allegations in Paragraph 57 on the basis that they are
22 argumentative. Further, to the extent that the allegations contained in Paragraph 57 are directed
23 to other defendants, LG Display America lacks knowledge or information sufficient to form a
24 belief as to the truth of these allegations and on this basis denies those allegations. To the extent
25 that the allegations in the sixth sentence of Paragraph 57 are based on plea agreements, those
26 agreements speak for themselves and no response is required. The allegations contained in the
27 seventh sentence of Paragraph 57 consist of Plaintiff's conclusions of law, to which no response
28 is required. To the extent that the allegations in Paragraph 57 are directed to LG Display America

1 and are deemed to require a response, they are denied.

2 58. Paragraph 58 is directed to another defendant. Accordingly, LG Display America
3 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
4 contained in Paragraph 58 and on this basis denies those allegations.

5 59. Paragraph 59 is directed to another defendant. Accordingly, LG Display America
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
7 contained in Paragraph 59 and on this basis denies those allegations.

8 60. Paragraph 60 is directed to another defendant. Accordingly, LG Display America
9 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
10 contained in Paragraph 60 and on this basis denies those allegations.

11 61. Paragraph 61 is directed to another defendant. Accordingly, LG Display America
12 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
13 contained in Paragraph 61 and on this basis denies those allegations.

14 62. Paragraph 62 is directed to another defendant. Accordingly, LG Display America
15 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
16 contained in Paragraph 62 and on this basis denies those allegations.

17 63. Paragraph 63 is directed to another defendant. Accordingly, LG Display America
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
19 contained in Paragraph 63 and on this basis denies those allegations.

20 64. Paragraph 64 is directed to another defendant. Accordingly, LG Display America
21 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
22 contained in Paragraph 64 and on this basis denies those allegations.

23 65. Paragraph 65 is directed to another defendant. Accordingly, LG Display America
24 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
25 contained in Paragraph 65 and on this basis denies those allegations.

26 66. Paragraph 66 is directed to another defendant. Accordingly, LG Display America
27 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
28 contained in Paragraph 66 and on this basis denies those allegations.

1 67. Paragraph 67 is directed to another defendant. Accordingly, LG Display America
2 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
3 contained in Paragraph 67 and on this basis denies those allegations.

4 68. Paragraph 68 is directed to another defendant. Accordingly, LG Display America
5 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
6 contained in Paragraph 68 and on this basis denies those allegations.

7 69. Paragraph 69 is directed to another defendant. Accordingly, LG Display America
8 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
9 contained in Paragraph 69 and on this basis denies those allegations.

10 70. Paragraph 70 is directed to another defendant. Accordingly, LG Display America
11 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
12 contained in Paragraph 70 and on this basis denies those allegations.

13 71. Paragraph 71 is directed to another defendant. Accordingly, LG Display America
14 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
15 contained in Paragraph 71 and on this basis denies those allegations.

16 72. Paragraph 72 is directed to another defendant. Accordingly, LG Display America
17 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
18 contained in Paragraph 72 and on this basis denies those allegations.

19 73. Paragraph 73 is directed to another defendant. Accordingly, LG Display America
20 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
21 contained in Paragraph 73 and on this basis denies those allegations.

22 74. Paragraph 74 is directed to another defendant. Accordingly, LG Display America
23 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
24 contained in Paragraph 74 and on this basis denies those allegations.

25 75. Paragraph 75 is directed to another defendant. Accordingly, LG Display America
26 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
27 contained in Paragraph 75 and on this basis denies those allegations.

28 76. Paragraph 76 is directed to another defendant. Accordingly, LG Display America

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
2 contained in Paragraph 76 and on this basis denies those allegations.

3 77. Paragraph 77 is directed to another defendant. Accordingly, LG Display America
4 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
5 contained in Paragraph 77 and on this basis denies those allegations.

6 78. Paragraph 78 is directed to another defendant. Accordingly, LG Display America
7 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
8 contained in Paragraph 78 and on this basis denies those allegations.

9 79. Paragraph 79 is directed to another defendant. Accordingly, LG Display America
10 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 79 and on this basis denies those allegations.

12 80. Paragraph 80 consists of Plaintiff's conclusions of law, to which no response is
13 required.

14 81. Paragraph 81 consists of Plaintiff's conclusions of law, to which no response is
15 required.

16 82. Paragraph 82 contains Plaintiff's conclusions of law, to which no response is
17 required. To the extent that Paragraph 82 is directed to other corporate entities, LG Display
18 America lacks knowledge or information sufficient to form a belief as to the truth of the
19 allegations contained in Paragraph 82 and on this basis denies those allegations.

20 83. Paragraph 83 consists of Plaintiff's conclusions of law, to which no response is
21 required.

22 84. Paragraph 84 consists of Plaintiff's conclusions of law, to which no response is
23 required.

24 85. LG Display America admits the first sentence of Paragraph 85. The remaining
25 allegations contained in Paragraph 85 are denied on the basis that they are vague.

26 86. The allegations contained in Paragraph 86 consist of the Plaintiff's conclusions of
27 law, to which no response is required. To the extent that the allegations in Paragraph 86 are
28 deemed to require a response, they are denied.

1 87. LG Display America lacks knowledge or information sufficient to form a belief as
2 to the truth of the allegations in Paragraph 87 and on this basis denies those allegations. To the
3 extent that the allegations in Paragraph 87 are deemed to require a response, they are denied on
4 the basis that they are vague.

5 88. Paragraph 88 contains Plaintiff's characterizations, to which no response is
6 required.

7 89. To the extent that the allegations contained in Paragraph 89 are directed to other
8 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
9 the truth of these allegations and on this basis denies those allegations. To the extent that the
10 allegations in Paragraph 89 are directed to LG Display America and are deemed to require a
11 response, they are denied on the basis that they are vague.

12 90. The allegations contained in the first, fourth, and fifth sentences of Paragraph 90
13 consist of Plaintiff's conclusions of law, to which no response is required. LG Display America
14 denies the allegations contained in the second and third sentences of Paragraph 90 on the basis
15 that they are vague.

16 91. LG Display America denies the allegations contained in Paragraph 91.

17 92. LG Display America denies the first sentence of Paragraph 92. The second
18 sentence of Paragraph 92 contains Plaintiff's conclusions of law, to which no response is
19 required.

20 93. LG Display America denies the allegations contained in Paragraph 93.

21 94. LG Display America denies the allegations contained in the first sentence of
22 Paragraph 94 on the basis that they are vague. Further, Paragraph 94 contains Plaintiff's
23 characterizations and is argumentative, to which no response is required. To the extent that the
24 allegations in Paragraph 94 are directed to LG Display America and are deemed to require a
25 response, they are denied.

26 95. LG Display America lacks knowledge or information sufficient to form a belief as
27 to the truth of the allegations contained in Paragraph 95 and on this basis denies them.

28 96. LG Display America denies the allegations contained in Paragraph 96.

1 97. LG Display America admits that several trade organizations put on industry-wide
2 meetings. To the extent that the remaining allegations contained in Paragraph 97 are directed to
3 other defendants, LG Display America lacks knowledge or information sufficient to form a belief
4 as to the truth of the allegations contained in Paragraph 97 and on this basis denies those
5 allegations. The last sentence of Paragraph 97 contains Plaintiff's conclusions of law, to which
6 no response is required. To the extent that the remaining allegations in Paragraph 97 are directed
7 to LG Display America, they are denied.

8 98. LG Display America lacks knowledge or information sufficient to form a belief as
9 to the truth of the allegations contained in the first sentence of Paragraph 98 and on this basis
10 denies them. The second and third sentences of Paragraph 98 contain Plaintiff's conclusions of
11 law, to which no response is required. To the extent the remainder of Paragraph 98 is directed to
12 other defendants, LG Display America lacks knowledge or information sufficient to form a belief
13 as to the truth of the allegations contained in Paragraph 98 and on this basis denies those
14 allegations. To the extent that the remaining allegations in Paragraph 98 are directed to LG
15 Display America and are deemed to require a response, they are denied.

16 99. The second and third sentences of Paragraph 99 are directed to other defendants.
17 Accordingly, LG Display America lacks knowledge or information sufficient to form a belief as
18 to the truth of the allegations contained in Paragraph 99 and on this basis denies those allegations.
19 To the extent that the remaining allegations in Paragraph 99 are directed to LG Display America
20 and are deemed to require a response, they are denied.

21 100. Paragraph 100 contains Plaintiff's conclusions of law and is argumentative, to
22 which no response is required. To the extent the remainder of Paragraph 100 is directed to other
23 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
24 the truth of the allegations contained in Paragraph 100 and on this basis denies those allegations.
25 To the extent that the remaining allegations in Paragraph 100 are directed to LG Display America
26 and are deemed to require a response, they are denied.

27 101. Paragraph 101 is directed to other defendants. Accordingly, LG Display America
28 lacks knowledge or information sufficient to form a belief as to the truth of the allegations

1 contained in Paragraph 101 and on this basis denies those allegations.

2 102. Paragraph 102 is directed to other defendants. Accordingly, LG Display America
3 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
4 contained in Paragraph 102 and on this basis denies those allegations.

5 103. Paragraph 103 is directed to other defendants. Accordingly, LG Display America
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
7 contained in Paragraph 103 and on this basis denies those allegations. To the extent the
8 allegations in Paragraph 103 incorporate Plaintiff's term "LG," LG Display America denies the
9 allegations on the basis that they are vague.

10 104. Paragraph 104 is directed to other defendants. Accordingly, LG Display America
11 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
12 contained in Paragraph 104 and on this basis denies those allegations. To the extent the
13 allegations in Paragraph 104 incorporate Plaintiff's term "LG," LG Display America denies the
14 allegations on the basis that they are vague. To the extent that the remaining allegations in
15 Paragraph 104 are directed to LG Display America and are deemed to require a response, they are
16 denied.

17 105. Paragraph 105 is directed to other defendants. Accordingly, LG Display America
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
19 contained in Paragraph 105 and on this basis denies those allegations.

20 106. To the extent that Paragraph 106 is directed to another defendant, LG Display
21 America lacks knowledge or information sufficient to form a belief as to the truth of the
22 allegations contained in Paragraph 106 and on this basis denies those allegations. To the extent
23 the allegations in Paragraph 106 incorporate Plaintiff's term "LG," LG Display America denies
24 the allegations on the basis that they are vague.

25 107. Paragraph 107 is directed to other defendants. Accordingly, LG Display America
26 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
27 contained in Paragraph 107 and on this basis denies those allegations.

28 108. Paragraph 108 is directed to other defendants. Accordingly, LG Display America

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
2 contained in Paragraph 108 and on this basis denies those allegations.

3 109. Paragraph 109 is directed to other defendants. Accordingly, LG Display America
4 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
5 contained in Paragraph 109 and on this basis denies those allegations.

6 110. Paragraph 110 is directed to other defendants. Accordingly, LG Display America
7 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
8 contained in Paragraph 110 and on this basis denies those allegations.

9 111. Paragraph 111 is directed to other defendants. Accordingly, LG Display America
10 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 111 and on this basis denies those allegations.

12 112. Paragraph 112 contains Plaintiff's conclusions of law, to which no response is
13 required. To the extent that Paragraph 112 is directed to other defendants, LG Display America
14 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
15 contained in Paragraph 112 and on this basis denies those allegations. To the extent that the
16 remaining allegations in Paragraph 112 are directed to LG Display America and are deemed to
17 require a response, they are denied.

18 113. LG Display America admits that certain employees of LG Display Co. participated
19 in meetings referred to as "crystal meetings." To the extent that the allegations contained in
20 Paragraph 113 are directed to other defendants, LG Display America lacks knowledge or
21 information sufficient to form a belief as to the truth of the allegations contained in Paragraph 113
22 and on this basis denies those allegations. To the extent that the remaining allegations in
23 Paragraph 113 are directed at LG Display America, and are deemed to require a response, they
24 are denied.

25 114. LG Display America admits that certain employees of LG Display Co. participated
26 in meetings referred to as "crystal meetings." LG Display America denies that LG Display
27 America's CEO or President attended any crystal meeting, including "CEO" or "top" meetings.
28 To the extent that the allegations contained in Paragraph 114 are directed to other defendants, LG

1 Display America lacks knowledge or information sufficient to form a belief as to the truth of the
2 allegations contained in Paragraph 114 and on this basis denies those allegations. To the extent
3 that the remaining allegations in Paragraph 114 are directed at LG Display America, and are
4 deemed to require a response, they are denied.

5 115. LG Display America denies the allegations contained in Paragraph 115.

6 116. LG Display America denies the allegations contained in Paragraph 116.

7 117. LG Display America denies the allegations contained in Paragraph 117.

8 118. LG Display America denies the allegations contained in Paragraph 118.

9 119. LG Display America denies the allegations contained in Paragraph 119.

10 120. LG Display America denies the allegations contained in Paragraph 120.

11 Specifically, to the extent the allegations in Paragraph 120 incorporate Plaintiff's term "LCD,"
12 LG Display America denies the allegations on the basis that they are vague.

13 121. LG Display America denies the allegations contained in Paragraph 121.

14 Specifically, to the extent the allegations in Paragraph 121 incorporate Plaintiff's term "LCDs,"
15 LG Display America denies the allegations on the basis that they are vague.

16 122. LG Display America denies the allegations contained in Paragraph 122.

17 123. LG Display America denies the allegations contained in Paragraph 123.

18 124. Paragraph 124 is directed to other defendants. Accordingly, LG Display America
19 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
20 contained in Paragraph 124 and on this basis denies those allegations.

21 125. Paragraph 125 is directed to other defendants. Accordingly, LG Display America
22 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
23 contained in Paragraph 125 and on this basis denies those allegations.

24 126. Paragraph 126 is directed to other defendants. Accordingly, LG Display America
25 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
26 contained in Paragraph 126 and on this basis denies those allegations.

27 127. To the extent that the allegations contained in Paragraph 127 are directed to other
28 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to

1 the truth of the allegations contained in Paragraph 127 and on this basis denies those allegations.

2 128. Paragraph 128 is directed to another defendant. Accordingly, LG Display America
3 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
4 contained in Paragraph 128 and on this basis denies those allegations.

5 129. To the extent that Paragraph 129 is directed to other defendants, LG Display
6 America lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations contained in Paragraph 129 and on this basis denies those allegations. Further, to the
8 extent the allegations in Paragraph 129 incorporate Plaintiff's term "LCDs" and are directed to
9 LG Display America, those allegations are denied on the basis that they are vague.

10 130. Paragraph 130 is directed to another defendant. Accordingly, LG Display America
11 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
12 contained in Paragraph 130 and on this basis denies those allegations.

13 131. Paragraph 131 is directed to another defendant. Accordingly, LG Display America
14 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
15 contained in Paragraph 131 and on this basis denies those allegations.

16 132. To the extent that Paragraph 132 is directed to other defendants, LG Display
17 America lacks knowledge or information sufficient to form a belief as to the truth of the
18 allegations contained in Paragraph 132 and on this basis denies those allegations. Further, to the
19 extent the allegations in Paragraph 132 incorporate Plaintiff's term "LCDs" and are directed to
20 LG Display, LG Display America denies the allegations on the basis that they are vague.

21 133. Paragraph 133 is directed to other defendants. Accordingly, LG Display America
22 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
23 contained in Paragraph 133 and on this basis denies those allegations.

24 134. Paragraph 134 is directed to other defendants. Accordingly, LG Display America
25 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
26 contained in Paragraph 134 and on this basis denies those allegations.

27 135. Paragraph 135 is directed to another defendant. Accordingly, LG Display America
28 lacks knowledge or information sufficient to form a belief as to the truth of the allegations

1 contained in Paragraph 135 and on this basis denies those allegations.

2 136. Paragraph 136 is directed to other defendants. Accordingly, LG Display America
3 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
4 contained in Paragraph 136 and on this basis denies those allegations.

5 137. To the extent that Paragraph 137 is directed to other defendants, LG Display
6 America lacks knowledge or information sufficient to form a belief as to the truth of the
7 allegations contained in Paragraph 137 and on this basis denies those allegations. Further, to the
8 extent the allegations in Paragraph 137 incorporate Plaintiff's term "LCD" and are directed to LG
9 Display, LG Display America denies the allegations on the basis that they are vague.

10 138. To the extent that Paragraph 138 is directed to other defendants, LG Display
11 America lacks knowledge or information sufficient to form a belief as to the truth of the
12 allegations contained in Paragraph 138 and on this basis denies those allegations. To the extent
13 that the remaining allegations in Paragraph 138 are directed to LG Display America and are
14 deemed to require a response, they are denied.

15 139. LG Display America denies the allegations contained in Paragraph 139.

16 140. Paragraph 140 is directed to another defendant. Accordingly, LG Display America
17 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
18 contained in Paragraph 140 and on this basis denies those allegations.

19 141. Paragraph 141 is directed to other defendants. Accordingly, LG Display America
20 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
21 contained in Paragraph 141 and on this basis denies those allegations.

22 142. LG Display America admits that LG Display Co. was formerly known as
23 LG.Philips LCD Co., Ltd. LG Display America objects to the first sentence of Paragraph 142 to
24 the extent that the term "joint venture" is used as a legal term of art, and on that basis denies the
25 allegations contained in the first sentence of Paragraph 142. LG Display America denies the
26 allegations contained in the third and fourth sentences of Paragraph 142. The remaining
27 allegations of Paragraph 142 contain Plaintiff's conclusions of law, to which no response is
28 required. To the extent the allegations contained in Paragraph 142 are directed at other corporate

1 entities, LG Display America lacks knowledge or information sufficient to form a belief as to the
2 truth of such allegations and on this basis denies them. To the extent that the remaining
3 allegations in Paragraph 142 are directed at LG Display America, and are deemed to require a
4 response, they are denied. LG Display America specifically denies allegations incorporating
5 Plaintiff's term "LCD" on the basis that they are vague.

6 143. Paragraph 143 is directed to other defendants. Accordingly, LG Display America
7 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
8 contained in Paragraph 143 and on this basis denies those allegations.

9 144. Paragraph 144 is directed to other defendants. Accordingly, LG Display America
10 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 144 and on this basis denies those allegations.

12 145. Paragraph 145 is directed to another defendant. Accordingly, LG Display America
13 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
14 contained in Paragraph 145 and on this basis denies those allegations.

15 146. Paragraph 146 is directed to another defendant. Accordingly, LG Display America
16 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
17 contained in Paragraph 146 and on this basis denies those allegations. To the extent that the
18 remaining allegations in Paragraph 146 are directed to LG Display America and incorporate
19 Plaintiff's terms "TFT-LCDs" and "STN-LCDs," they are denied on the basis that they are vague.

20 147. Paragraph 147 is directed to another defendant. Accordingly, LG Display America
21 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
22 contained in Paragraph 147 and on this basis denies those allegations. To the extent that the
23 remaining allegations in Paragraph 147 are directed to LG Display America, and incorporate
24 Plaintiff's term "LCD," they are denied on the basis that they are vague.

25 148. Paragraph 148 is directed to other defendants. Accordingly, LG Display America
26 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
27 contained in Paragraph 148 and on this basis denies those allegations.

28 149. Paragraph 149 is directed to other defendants. Accordingly, LG Display America

1 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
2 contained in Paragraph 149 and on this basis denies those allegations.

3 150. Paragraph 150 is directed to another defendant. Accordingly, LG Display America
4 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
5 contained in Paragraph 150 and on this basis denies those allegations. To the extent that the
6 remaining allegations in Paragraph 150 are directed to LG Display America, and incorporate
7 Plaintiff's term "LCDs," they are denied on the basis that they are vague.

8 151. Paragraph 151 is directed to other corporate entities. Accordingly, LG Display
9 America lacks knowledge or information sufficient to form a belief as to the truth of the
10 allegations contained in Paragraph 151 and on this basis denies those allegations.

11 152. Paragraph 152 is directed to another corporate entity. Accordingly, LG Display
12 America lacks knowledge or information sufficient to form a belief as to the truth of the
13 allegations contained in Paragraph 152 and on this basis denies those allegations.

14 153. Paragraph 153 is directed to another corporate entity. Accordingly, LG Display
15 America lacks knowledge or information sufficient to form a belief as to the truth of the
16 allegations contained in Paragraph 153 and on this basis denies those allegations.

17 154. Paragraph 154 is directed to another defendant. Accordingly, LG Display America
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
19 contained in Paragraph 154 and on this basis denies those allegations. To the extent that the
20 remaining allegations in Paragraph 154 are directed to LG Display America and are deemed to
21 require a response, they are denied.

22 155. To the extent that the allegations contained in Paragraph 155 are directed to other
23 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
24 the truth of the allegations contained in Paragraph 155 and on this basis denies those allegations.
25 To the extent that the allegations in Paragraph 155 are directed to LG Display America, they are
26 denied.

27 156. To the extent that the allegations contained in Paragraph 156 are directed to other
28 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to

1 the truth of the allegations contained in Paragraph 156 and on this basis denies those allegations.
2 To the extent that the remaining allegations in Paragraph 156 are directed at LG Display America,
3 they are denied.

4 157. The first sentence of Paragraph 157 contains Plaintiff's characterizations and is
5 argumentative, to which no response is required. To the extent that the allegations contained in
6 Paragraph 157 are directed to other defendants, LG Display America lacks knowledge or
7 information sufficient to form a belief as to the truth of the allegations contained in Paragraph 157
8 and on this basis denies those allegations. To the extent that the remaining allegations in
9 Paragraph 157 are directed at LG Display America, they are denied.

10 158. To the extent that the allegations contained in Paragraph 158 are directed to other
11 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
12 the truth of the allegations contained in Paragraph 158 and on this basis denies those allegations.
13 To the extent that the remaining allegations in Paragraph 158 are directed to LG Display America
14 and are deemed to require a response, they are denied.

15 159. To the extent that the allegations contained in Paragraph 159 are directed to other
16 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
17 the truth of the allegations contained in Paragraph 159 and on this basis denies those allegations.
18 To the extent that the remaining allegations in Paragraph 159 are directed to LG Display America
19 and are deemed to require a response, they are denied.

20 160. To the extent that the allegations contained in Paragraph 160 are directed to other
21 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
22 the truth of the allegations contained in Paragraph 160 and on this basis denies those allegations.
23 To the extent that the remaining allegations in Paragraph 160 are directed to LG Display America
24 and are deemed to require a response, they are denied.

25 161. To the extent that the allegations contained in Paragraph 161 are directed to other
26 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
27 the truth of the allegations contained in Paragraph 161 and on this basis denies those allegations.
28 To the extent that the allegations in Paragraph 161 are directed to LG Display America, they are

1 denied.

2 162. To the extent that the allegations contained in Paragraph 162 are directed to other
3 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
4 the truth of the allegations contained in Paragraph 162 and on this basis denies those allegations.
5 To the extent that the allegations in Paragraph 162 are directed to LG Display America, they are
6 denied.

7 163. To the extent that the allegations contained in Paragraph 163 are directed to other
8 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
9 the truth of the allegations contained in Paragraph 163 and on this basis denies those allegations.
10 To the extent that the allegations in Paragraph 163 are based on plea agreements, those
11 agreements speak for themselves and no response is required. To the extent the allegations in
12 Paragraph 163 incorporate Plaintiff's term "LG," LG Display America denies the allegations on
13 the basis that they are vague. To the extent that the remaining allegations in Paragraph 163 are
14 directed to LG Display America and are deemed to require a response, they are denied.

15 164. The allegations contained in Paragraph 164 consist of the Plaintiff's conclusions of
16 law, to which no response is required. To the extent that the allegations contained in Paragraph
17 164 are directed to other defendants, LG Display America lacks knowledge or information
18 sufficient to form a belief as to the truth of these allegations and on this basis denies those
19 allegations. To the extent that the allegations in Paragraph 164 are directed to LG Display
20 America and are deemed to require a response, they are denied.

21 165. Paragraph 165 is directed to another defendant. Accordingly, LG Display America
22 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
23 contained in Paragraph 165 and on this basis denies those allegations.

24 166. Paragraph 166 is directed to another defendant. Accordingly, LG Display America
25 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
26 contained in Paragraph 166 and on this basis denies those allegations.

27 167. Paragraph 167 is directed to another defendant. Accordingly, LG Display America
28 lacks knowledge or information sufficient to form a belief as to the truth of the allegations

1 contained in Paragraph 167 and on this basis denies those allegations.

2 168. Paragraph 168 is directed to another defendant. Accordingly, LG Display America
3 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
4 contained in Paragraph 168 and on this basis denies those allegations.

5 169. Paragraph 169 is directed to other defendants. Accordingly, LG Display America
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
7 contained in Paragraph 169 and on this basis denies those allegations.

8 170. LG Display America admits that it maintains its principal place of business in San
9 Jose, California. To the extent that the allegations in Paragraph 170 are based on plea
10 agreements, those agreements speak for themselves and no response is required. To the extent
11 that the allegations contained in Paragraph 170 are directed to other defendants, LG Display
12 America lacks knowledge or information sufficient to form a belief as to the truth of these
13 allegations and on this basis denies those allegations. To the extent that the remaining allegations
14 in Paragraph 170 are deemed to require a response and are directed to LG Display America or LG
15 Display America, Inc., they are denied.

16 171. Paragraph 171 is directed to another defendant. Accordingly, LG Display America
17 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
18 contained in Paragraph 171 and on this basis denies those allegations.

19 172. Paragraph 172 is directed to another defendant. Accordingly, LG Display America
20 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
21 contained in Paragraph 172 and on this basis denies those allegations.

22 173. Paragraph 173 is directed to another defendant. Accordingly, LG Display America
23 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
24 contained in Paragraph 173 and on this basis denies those allegations.

25 174. LG Display America admits the first sentence of Paragraph 174. The second
26 sentence of Paragraph 174 is based on public statements or records, and those statements and
27 records speak for themselves and no response is required.

28 175. Paragraph 175 is based on public statements or records, and those statements and

1 records speak for themselves and no response is required.

2 176. To the extent that the allegations contained in Paragraph 176 are directed to other
3 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
4 the truth of the allegations contained in Paragraph 176 and on this basis denies those allegations.
5 To the extent that allegations in Paragraph 176 are based on public statements or plea agreements,
6 those statements and agreements speak for themselves and no response is required.

7 177. Paragraph 177 is directed to another defendant. Accordingly, LG Display America
8 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
9 contained in Paragraph 177 and on this basis denies those allegations.

10 178. LG Display America admits that it has entered into a plea agreement. To the extent
11 that allegations in Paragraph 178 are based on public statements or plea agreements, those
12 statements and agreements speak for themselves and no response is required.

13 179. To the extent that allegations in Paragraph 179 are based on public statements or
14 plea agreements, those statements and agreements speak for themselves and no response is
15 required. LG Display America admits that Chung Suk “C.S.” Chung, a former executive from
16 LG Display Co., has pleaded guilty. To the extent that the remaining allegations in Paragraph
17 179 are directed to LG Display America and deemed to require a response, they are denied.

18 180. To the extent that allegations in Paragraph 180 are based on public statements or
19 plea agreements, those statements and agreements speak for themselves and no response is
20 required. LG Display America admits that Bock Kwon, an executive from LG Display Co., has
21 pleaded guilty. To the extent that the remaining allegations in Paragraph 180 are directed to LG
22 Display America and deemed to require a response, they are denied.

23 181. To the extent that allegations in Paragraph 181 are based on indictments or public
24 statements, those indictments and statements speak for themselves and no response is required.
25 To the extent that the remaining allegations in Paragraph 181 are directed to LG Display America
26 and deemed to require a response, they are denied.

27 182. Paragraph 182 is directed to another defendant. Accordingly, LG Display America
28 lacks knowledge or information sufficient to form a belief as to the truth of the allegations

1 contained in Paragraph 182 and on this basis denies those allegations.

2 183. Paragraph 183 is directed to another defendant. Accordingly, LG Display America
3 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
4 contained in Paragraph 183 and on this basis denies those allegations.

5 184. Paragraph 184 is directed to another defendant. Accordingly, LG Display America
6 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
7 contained in Paragraph 184 and on this basis denies those allegations.

8 185. Paragraph 185 is directed to another defendant. Accordingly, LG Display America
9 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
10 contained in Paragraph 185 and on this basis denies those allegations.

11 186. Paragraph 186 is directed to another defendant. Accordingly, LG Display America
12 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
13 contained in Paragraph 186 and on this basis denies those allegations.

14 187. Paragraph 187 is directed to another defendant. Accordingly, LG Display America
15 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
16 contained in Paragraph 187 and on this basis denies those allegations.

17 188. Paragraph 188 is directed to another defendant. Accordingly, LG Display America
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
19 contained in Paragraph 188 and on this basis denies those allegations.

20 189. Paragraph 189 is directed to other defendants. Accordingly, LG Display America
21 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
22 contained in Paragraph 189 and on this basis denies those allegations. LG Display America
23 admits that Toshiba purchased a stake in LG Display Co.'s manufacturing facility in Poland. To
24 the extent that the remaining allegations in Paragraph 189 are deemed to require a response, they
25 are denied.

26 190. The allegations contained in Paragraph 190 consist of Plaintiff's characterizations
27 of its claims and conclusions of law, to which no response is required. To the extent that those
28 allegations may be deemed to require a response and are directed to other defendants or corporate

1 entities, LG Display America lacks knowledge or information sufficient to form a belief as to the
2 truth of the allegations, and on this basis denies those allegations. To the extent that the
3 allegations contained in Paragraph 190 may be deemed to require a response and are directed to
4 LG Display America, they are denied.

5 191. Paragraph 191 contains Plaintiff's conclusions of law, to which no response is
6 required.

7 192. To the extent the allegations contained in Paragraph 192 are derived from analysts'
8 reports, those reports speak for themselves and no response is required. LG Display America
9 otherwise denies the allegations contained in Paragraph 192.

10 193. The allegations contained in Paragraph 193 consist of Plaintiff's characterizations
11 of its claims and conclusions of law, to which no response is required.

12 194. To the extent the allegations contained in Paragraph 194 are derived from analysts'
13 reports, those reports speak for themselves and no response is required. LG Display America
14 otherwise denies the allegations contained in Paragraph 194.

15 195. Paragraph 195 contains Plaintiff's conclusions of law, to which no response is
16 required. To the extent that the allegations in Paragraph 195 may be deemed to require a
17 response and are directed to other defendants or corporate entities, LG Display America lacks
18 knowledge or information sufficient to form a belief as to the truth of the allegations, and on this
19 basis denies those allegations. To the extent that the allegations contained in Paragraph 195 may
20 be deemed to require a response and are directed to LG Display America, they are denied.

21 196. Paragraph 196 contains Plaintiff's conclusions of law, to which no response is
22 required. To the extent that the allegations in Paragraph 196 may be deemed to require a
23 response and are directed to other defendants or corporate entities, LG Display America lacks
24 knowledge or information sufficient to form a belief as to the truth of the allegations, and on this
25 basis denies those allegations. To the extent that the allegations contained in Paragraph 196 may
26 be deemed to require a response and are directed to LG Display America, they are denied.

27 197. To the extent that the allegations contained in Paragraph 197 were derived from
28 industry publications, those publications speak for themselves and no response is required. To

1 the extent that the allegations contained in Paragraph 197 may be deemed to require a response
2 and are directed to LG Display America, they are denied.

3 198. To the extent that the allegations contained in Paragraph 198 were derived from
4 analyst reports, those reports speak for themselves and no response is required. To the extent that
5 the allegations contained in Paragraph 198 may be deemed to require a response and are directed
6 to LG Display America, they are denied.

7 199. Paragraph 199 contains Plaintiff's conclusions of law, to which no response is
8 required. To the extent that the allegations in Paragraph 199 are directed to other corporate
9 entities, LG Display America lacks knowledge or information sufficient to form a belief as to the
10 truth of the allegations, and on this basis denies those allegations. To the extent that the
11 allegations contained in Paragraph 199 may be deemed to require a response and are directed to
12 LG Display America, they are denied.

13 200. The allegations contained in Paragraph 200 consist of Plaintiff's characterizations
14 and conclusions of law, to which no response is required. To the extent that the allegations
15 contained in Paragraph 200 may be deemed to require a response and are directed to LG Display
16 America, they are denied.

17 201. The allegations contained in Paragraph 201 consist of Plaintiff's characterizations
18 and conclusions of law, to which no response is required. To the extent that the allegations
19 contained in Paragraph 201 may be deemed to require a response and are directed to LG Display
20 America, they are denied.

21 202. LG Display America lacks knowledge or information sufficient to form a belief as
22 to the truth of the allegations in Paragraph 202 and on this basis denies those allegations.

23 203. The allegations contained in Paragraph 203 consist of Plaintiff's characterizations
24 and conclusions of law, to which no response is required. To the extent that the allegations
25 contained in Paragraph 203 may be deemed to require a response and are directed to LG Display
26 America, they are denied.

27 204. The allegations contained in Paragraph 204 consist of Plaintiff's characterizations
28 and conclusions of law, to which no response is required. To the extent that the allegations in

1 Paragraph 204 are directed to other defendants, LG Display America lacks knowledge or
2 information sufficient to form a belief as to the truth of the allegations, and on this basis denies
3 those allegations. To the extent that the allegations contained in Paragraph 204 may be deemed to
4 require a response and are directed to LG Display America, they are denied.

5 205. The allegations contained in the first sentence of Paragraph 205 consist of
6 Plaintiff's characterizations, to which no response is required. The remainder of Paragraph 205 is
7 directed to other defendants. Accordingly, LG Display America lacks knowledge or information
8 sufficient to form a belief as to the truth of the allegations contained in Paragraph 205 and on this
9 basis denies those allegations.

10 206. LG Display America lacks knowledge or information sufficient to form a belief as
11 to the truth of the allegations in Paragraph 206 and on this basis denies those allegations.

12 207. The allegations in Paragraph 207 are directed to other defendants. Accordingly, LG
13 Display America lacks knowledge or information sufficient to form a belief as to the truth of the
14 allegations, and on this basis denies those allegations. To the extent that the allegations contained
15 in Paragraph 207 may be deemed to require a response and are directed to LG Display America,
16 they are denied.

17 208. To the extent that the allegations in Paragraph 208 are directed to other defendants,
18 LG Display America lacks knowledge or information sufficient to form a belief as to the truth of
19 the allegations, and on this basis denies those allegations. To the extent that the allegations
20 contained in Paragraph 208 may be deemed to require a response and are directed to LG Display
21 America, they are denied.

22 209. Paragraph 209 is directed to another defendant. Accordingly, LG Display America
23 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
24 contained in Paragraph 209 and on this basis denies those allegations.

25 210. LG Display America lacks knowledge or information sufficient to form a belief as
26 to the truth of the allegations contained in Paragraph 210 and on this basis denies those
27 allegations.

28 211. To the extent that the allegations contained in Paragraph 211 are directed to other

1 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
2 the truth of the allegations contained in Paragraph 211 and on this basis denies those allegations.
3 To the extent the allegations in Paragraph 211 incorporate Plaintiff’s term “LG,” LG Display
4 America denies the allegations on the basis that they are vague. LG Display America was not in
5 existence during the time period covered by the allegations contained in Paragraph 211, and on
6 that basis denies any allegations directed to it.

7 212. Paragraph 212 is directed to another defendant. Accordingly, LG Display America
8 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
9 contained in Paragraph 212 and on this basis denies those allegations.

10 213. Paragraph 213 is directed to another defendant. Accordingly, LG Display America
11 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
12 contained in Paragraph 213 and on this basis denies those allegations.

13 214. Paragraph 214 is directed to other defendants. Accordingly, LG Display America
14 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
15 contained in Paragraph 214 and on this basis denies those allegations.

16 215. Paragraph 215 is directed to other defendants. Accordingly, LG Display America
17 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
18 contained in Paragraph 215 and on this basis denies those allegations.

19 216. Paragraph 216 is directed to another defendant. Accordingly, LG Display America
20 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
21 contained in Paragraph 216 and on this basis denies those allegations. To the extent that the
22 remaining allegations in Paragraph 216 are directed to LG Display America, and incorporate
23 Plaintiff’s term “LCDs,” they are denied on the basis that they are vague.

24 217. Paragraph 217 is directed to another defendant. Accordingly, LG Display America
25 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
26 contained in Paragraph 217 and on this basis denies those allegations.

27 218. To the extent that the allegations contained in Paragraph 218 are directed to other
28 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to

1 the truth of these allegations and on this basis denies those allegations. To the extent that the
2 allegations in Paragraph 218 are directed to LG Display America and are deemed to require a
3 response, they are denied.

4 219. To the extent that the allegations contained in Paragraph 219 are directed to other
5 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
6 the truth of these allegations and on this basis denies those allegations. To the extent that the
7 allegations in Paragraph 219 are directed to LG Display America and are deemed to require a
8 response, they are denied.

9 220. Paragraph 220 is directed to other defendants. Accordingly, LG Display America
10 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
11 contained in Paragraph 220 and on this basis denies those allegations.

12 221. To the extent that the allegations contained in Paragraph 221 are directed to other
13 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
14 the truth of these allegations and on this basis denies those allegations. To the extent that the
15 allegations in Paragraph 221 are directed to LG Display America and are deemed to require a
16 response, they are denied.

17 222. The allegations contained in Paragraph 222 consist of Plaintiff's conclusions of law,
18 to which no response is required.

19 223. The first sentence of Paragraph 223 consists of Plaintiff's characterizations and
20 conclusions of law, to which no response is required. LG Display America otherwise lacks
21 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
22 Paragraph 223 and on this basis denies those allegations.

23 224. The first sentence of Paragraph 224 consists of Plaintiff's characterizations and
24 conclusions of law, to which no response is required. LG Display America otherwise lacks
25 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
26 Paragraph 224 and on this basis denies those allegations.

27 225. LG Display America lacks knowledge or information sufficient to form a belief as
28 to the truth of the allegations contained the first sentence of Paragraph 225 and on this basis

1 denies those allegations. To the extent the second and third sentences of Paragraph 225 are
2 directed to another defendant, LG Display America lacks knowledge or information sufficient to
3 form a belief as to the truth of the allegations contained in Paragraph 225 and on this basis denies
4 those allegations. To the extent that the remaining allegations in Paragraph 225 are directed to
5 LG Display America and are deemed to require a response, they are denied.

6 226. LG Display America lacks knowledge or information sufficient to form a belief as
7 to the truth of the allegations contained in Paragraph 226 and on this basis denies those
8 allegations.

9 227. The first sentence of Paragraph 227 consists of Plaintiff's characterizations and
10 conclusions of law, to which no response is required. The second sentence of Paragraph 227 is
11 directed to another defendant. Accordingly, LG Display America lacks knowledge or
12 information sufficient to form a belief as to the truth of the allegations contained in Paragraph 227
13 and on this basis denies those allegations.

14 228. LG Display America lacks knowledge or information sufficient to form a belief as
15 to the truth of the allegations contained in Paragraph 228 and on this basis denies those
16 allegations.

17 229. To the extent that the allegations contained in Paragraph 229 are directed to other
18 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
19 the truth of these allegations and on this basis denies those allegations. To the extent that the
20 allegations in Paragraph 229 are directed to LG Display America and are deemed to require a
21 response, they are denied.

22 230. To the extent that the allegations contained in Paragraph 230 are directed to other
23 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
24 the truth of the allegations contained in Paragraph 230 and on this basis denies those allegations.
25 To the extent the allegations contained in Paragraph 230 are directed to LG Display America,
26 they are denied.

27 231. LG Display America admits that several trade organizations put on industry-wide
28 meetings. To the extent that the remaining allegations contained in Paragraph 231 are directed to

1 other defendants, LG Display America lacks knowledge or information sufficient to form a belief
2 as to the truth of the allegations contained in Paragraph 231 and on this basis denies those
3 allegations. The second sentence of Paragraph 231 contains Plaintiff's conclusions of law, to
4 which no response is required. To the extent that the remaining allegations in Paragraph 231 are
5 directed to LG Display America, they are denied.

6 232. To the extent that the allegations contained in Paragraph 232 are directed to other
7 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
8 the truth of the allegations contained in Paragraph 232 and on this basis denies those allegations.
9 To the extent the allegations contained in Paragraph 232 are based on statements made by TTLA,
10 those statements speak for themselves and no response is required. The final sentence of
11 Paragraph 232 contains Plaintiff's conclusions of law, to which no response is required. To the
12 extent that the remaining allegations in Paragraph 232 are directed to LG Display America, they
13 are denied.

14 233. To the extent that the allegations contained in the first sentence of Paragraph 233
15 are directed to other defendants, LG Display America lacks knowledge or information sufficient
16 to form a belief as to the truth of the allegations contained in the first sentence of Paragraph 233
17 and on this basis denies those allegations. To the extent that the remaining sentences of
18 Paragraph 233 are based on statements issued by EDIRAK, those statements speak for themselves
19 and no response is required. To the extent that the remaining allegations contained in Paragraph
20 233 are directed to LG Display America and may be deemed to require further response, they are
21 denied.

22 234. Paragraph 234 is directed to other defendants. Accordingly, LG Display America
23 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
24 contained in Paragraph 234 and on this basis denies those allegations. The fourth sentence of
25 Paragraph 234 contains Plaintiff's conclusions of law, to which no response is required.

26 235. LG Display America lacks knowledge or information sufficient to form a belief as
27 to the truth of the allegations contained in Paragraph 235 and on this basis denies these
28 allegations.

1 236. To the extent that the allegations contained in Paragraph 236 were derived from the
2 SID 2004 speech called “Beyond the Crystal Gateway” and other public statements, those
3 statements speak for themselves and no response is required. To the extent that the remaining
4 allegations contained in Paragraph 236 are directed to other defendants, LG Display America
5 lacks knowledge or information sufficient to form a belief as to the truth of these allegations and
6 on this basis denies those allegations. To the extent that the remaining allegations in Paragraph
7 236 are directed to LG Display America, they are denied on the basis that they are vague.

8 237. To the extent that the allegations contained in Paragraph 237 were derived from the
9 SID 2005 speech called “2005: Beyond the Crystal Gateway,” those statements speak for
10 themselves and no response is required. To the extent that the remaining allegations contained in
11 Paragraph 237 are directed to other defendants, LG Display America lacks knowledge or
12 information sufficient to form a belief as to the truth of these allegations and on this basis denies
13 those allegations. To the extent that the remaining allegations in Paragraph 237 are directed to
14 LG Display America, LG Display America lacks knowledge or information sufficient to form a
15 belief as to the truth of the allegations contained in Paragraph 237 and on this basis denies those
16 allegations.

17 238. To the extent that the allegations contained in Paragraph 238 were derived from the
18 SID 2005 presentation entitled “Managing the Crystal Cycles,” those statements speak for
19 themselves and no response is required. Otherwise, LG Display America lacks knowledge or
20 information sufficient to form a belief as to the truth of the allegations contained in Paragraph 238
21 and on this basis denies these allegations

22 239. To the extent that the allegations contained in Paragraph 239 were derived from public
23 statements or presentations, those statements and presentations speak for themselves and no response
24 is required. To the extent that the remaining allegations contained in Paragraph 239 are directed
25 to other defendants, LG Display America lacks knowledge or information sufficient to form a
26 belief as to the truth of these allegations and on this basis denies those allegations. To the extent
27 that the remaining allegations in Paragraph 239 are directed to LG Display America, LG Display
28 America lacks knowledge or information sufficient to form a belief as to the truth of the

1 allegations contained in Paragraph 239 and on this basis denies those allegations.

2 240. LG Display America denies the allegations contained in the first sentence of
3 Paragraph 240. LG Display America admits the allegations contained in the second sentence of
4 Paragraph 240.

5 241. To the extent that the allegations contained in Paragraph 241 are directed to other
6 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
7 the truth of the allegations contained in Paragraph 241 and on this basis denies those allegations.
8 To the extent that the remaining allegations in Paragraph 241 are directed to LG Display
9 America, they are denied.

10 242. To the extent that the allegations contained in Paragraph 242 were derived from
11 statements by Dr. Hui Hsiung, those statements speak for themselves and no response is required.
12 To the extent that the allegations contained in Paragraph 242 may be deemed to require a
13 response and are directed to LG Display America, they are denied.

14 243. Paragraph 243 is directed to other defendants. Accordingly, LG Display America
15 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
16 contained in Paragraph 243 and on this basis denies those allegations.

17 244. To the extent that the allegations contained in Paragraph 244 are directed to other
18 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
19 the truth of the allegations contained in Paragraph 244 and on this basis denies those allegations.
20 To the extent that the remaining allegations in Paragraph 244 are directed to LG Display
21 America, they are denied.

22 245. The allegations contained in Paragraph 245 consist of Plaintiff's conclusions of law,
23 to which no response is required. To the extent that those allegations may be deemed to require a
24 response and are directed to other defendants, LG Display America lacks knowledge or
25 information sufficient to form a belief as to the truth of the allegations, and on this basis denies
26 those allegations. To the extent that the allegations contained in Paragraph 245 may be deemed to
27 require a response and are directed to LG Display America, they are denied.

28 246. To the extent that the allegations in Paragraph 246 may be deemed to require a

1 response and are directed to other defendants, LG Display America lacks knowledge or
2 information sufficient to form a belief as to the truth of the allegations, and on this basis denies
3 those allegations. To the extent that the allegations contained in Paragraph 246 are based on
4 informational articles or journals, they speak for themselves and no further response is required.
5 To the extent that the allegations contained in Paragraph 246 may be deemed to require a
6 response and are directed to LG Display America, they are denied on the basis that LG Display
7 lacks knowledge or information sufficient to form a belief as to the truth of the allegations and
8 they are vague.

9 247. The allegations contained in Paragraph 247 consist of the Plaintiff's conclusions of
10 law, to which no response is required. To the extent that the allegations contained in Paragraph
11 247 are directed to other defendants, LG Display America lacks knowledge or information
12 sufficient to form a belief as to the truth of these allegations and on this basis denies those
13 allegations. To the extent that the allegations in Paragraph 247 are directed to LG Display
14 America and are deemed to require a response, they are denied.

15 248. The allegations contained in Paragraph 248 consist of the Plaintiff's conclusions of
16 law, to which no response is required. To the extent that the allegations contained in Paragraph
17 248 are directed to other defendants, LG Display America lacks knowledge or information
18 sufficient to form a belief as to the truth of these allegations and on this basis denies those
19 allegations. To the extent that the allegations in Paragraph 248 are directed to LG Display
20 America and are deemed to require a response, they are denied.

21 249. To the extent that the allegations contained in Paragraph 249 are directed to other
22 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
23 the truth of these allegations and on this basis denies those allegations. To the extent that the
24 allegations in Paragraph 249 are directed to LG Display America and are deemed to require a
25 response, they are denied.

26 250. The allegations contained in Paragraph 250 consist of the Plaintiff's conclusions of
27 law, to which no response is required. To the extent that the allegations contained in Paragraph
28 250 are directed to other defendants, LG Display America lacks knowledge or information

1 sufficient to form a belief as to the truth of these allegations and on this basis denies those
2 allegations. To the extent that the allegations in Paragraph 250 are directed to LG Display
3 America and are deemed to require a response, they are denied.

4 251. Paragraph 251 contains Plaintiff's conclusions of law, to which no response is
5 required. To the extent that allegations in Paragraph 251 are based on public statements or plea
6 agreements, those statements and agreements speak for themselves and no response is required.
7 To the extent that the allegations contained in Paragraph 251 may be deemed to require a
8 response and are directed to other defendants, LG Display America lacks knowledge or
9 information sufficient to form a belief as to the truth of the allegations, and on this basis denies
10 those allegations. To the extent that the allegations contained in Paragraph 251 may be deemed to
11 require a response and are directed to LG Display America, they are denied.

12 252. The allegations contained in Paragraph 252 consist of the Plaintiff's conclusions of
13 law, to which no response is required. To the extent that the allegations contained in Paragraph
14 252 are directed to other defendants, LG Display America lacks knowledge or information
15 sufficient to form a belief as to the truth of these allegations and on this basis denies those
16 allegations. To the extent that the allegations in Paragraph 252 are directed to LG Display
17 America and are deemed to require a response, they are denied.

18 253. Paragraph 253 consists of Plaintiff's characterization of its claims and conclusions
19 of law, to which no response is required.

20 254. LG Display America lacks knowledge or information sufficient to form a belief as
21 to the truth of the allegations in Paragraph 254 and on this basis denies those allegations. To the
22 extent that the allegations contained in Paragraph 254 are directed to other defendants, LG
23 Display America lacks knowledge or information sufficient to form a belief as to the truth of
24 these allegations and on this basis denies those allegations. To the extent that the allegations in
25 Paragraph 254 are directed to LG Display America and are deemed to require a response, they are
26 denied.

27 255. Paragraph 255 is directed to other defendants. Accordingly, LG Display America
28 lacks knowledge or information sufficient to form a belief as to the truth of the allegations

1 contained in Paragraph 255 and on this basis denies those allegations.

2 256. Paragraph 256 contains Plaintiff's conclusions of law, to which no response is
3 required. Paragraph 256 is directed to other defendants. Accordingly, LG Display America lacks
4 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
5 Paragraph 256 and on this basis denies those allegations.

6 257. Paragraph 257 contains Plaintiff's conclusions of law, to which no response is
7 required. LG Display America lacks knowledge or information sufficient to form a belief as to
8 the truth of the allegations in Paragraph 257 and on this basis denies those allegations.

9 258. Paragraph 258 contains Plaintiff's conclusions of law, to which no response is
10 required. LG Display America lacks knowledge or information sufficient to form a belief as to
11 the truth of the allegations in Paragraph 258 and on this basis denies those allegations.

12 259. The allegations contained in Paragraph 259 consist of the Plaintiff's conclusions of
13 law, to which no response is required. To the extent that the allegations contained in Paragraph
14 259 are directed to other defendants, LG Display America lacks knowledge or information
15 sufficient to form a belief as to the truth of these allegations and on this basis denies those
16 allegations. To the extent that the allegations in Paragraph 259 are directed to LG Display
17 America and are deemed to require a response, they are denied.

18 260. The first sentence of Paragraph 260 contains Plaintiff's conclusions of law, to which
19 no response is required. To the extent that the allegations contained in Paragraph 260 are directed
20 to other defendants, LG Display America lacks knowledge or information sufficient to form a
21 belief as to the truth of these allegations and on this basis denies those allegations. To the extent
22 that the allegations in Paragraph 260 are directed to LG Display America and are deemed to
23 require a response, they are denied.

24 261. To the extent that the allegations contained in Paragraph 261 are directed to other
25 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
26 the truth of these allegations and on this basis denies those allegations. To the extent that the
27 allegations in Paragraph 261 are directed to LG Display America. and are deemed to require a
28 response, they are denied.

1 262. The first sentence of Paragraph 262 contains Plaintiff's conclusions of law, to which
2 no response is required. To the extent that the allegations contained in Paragraph 262 are directed
3 to other defendants, LG Display America lacks knowledge or information sufficient to form a
4 belief as to the truth of these allegations and on this basis denies those allegations. To the extent
5 that the allegations in Paragraph 262 are directed to LG Display America and are deemed to
6 require a response, they are denied.

7 263. To the extent that the allegations contained in Paragraph 263 are directed to other
8 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
9 the truth of these allegations and on this basis denies those allegations. To the extent that the
10 allegations in Paragraph 263 are directed to LG Display America and are deemed to require a
11 response, they are denied.

12 264. To the extent that the allegations contained in Paragraph 264 are directed to other
13 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
14 the truth of these allegations and on this basis denies those allegations. To the extent that the
15 allegations in Paragraph 264 are directed to LG Display America and are deemed to require a
16 response, they are denied on the basis that they are argumentative.

17 265. Paragraph 265 is directed to another defendant. Accordingly, LG Display America
18 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
19 contained in Paragraph 265 and on this basis denies those allegations.

20 266. To the extent that the allegations contained in Paragraph 266 are directed to other
21 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
22 the truth of these allegations and on this basis denies those allegations. To the extent that the
23 allegations in Paragraph 266 are directed to LG Display America and are deemed to require a
24 response, they are denied.

25 267. To the extent that the allegations contained in Paragraph 267 are directed to other
26 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
27 the truth of these allegations and on this basis denies those allegations. To the extent that the
28 allegations in Paragraph 267 are directed to LG Display America and are deemed to require a

1 response, they are denied.

2 268. The first and second sentences of Paragraph 268 consist of Plaintiff's
3 characterizations, to which no response is required. To the extent that the remaining allegations
4 contained in Paragraph 268 are directed to other defendants, LG Display America lacks
5 knowledge or information sufficient to form a belief as to the truth of these allegations and on this
6 basis denies those allegations. To the extent that the allegations contained in Paragraph 268 were
7 derived from public statements, those statements speak for themselves and no response is
8 required. To the extent that the allegations in Paragraph 268 are directed to LG Display America
9 and are deemed to require a response, they are denied.

10 269. To the extent that the allegations contained in Paragraph 269 are directed to other
11 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
12 the truth of these allegations and on this basis denies those allegations. To the extent that the
13 allegations in Paragraph 269 are directed to LG Display America and are deemed to require a
14 response, they are denied.

15 270. Paragraph 270 is directed to another defendant. Accordingly, LG Display America
16 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
17 contained in Paragraph 270 and on this basis denies those allegations.

18 271. The first sentence of Paragraph 271 contains Plaintiff's characterizations and is
19 argumentative, to which no response is required. To the extent that the allegations contained in
20 Paragraph 271 were derived from public statements, those statements speak for themselves and
21 no response is required. To the extent that the allegations in Paragraph 271 are directed to LG
22 Display America and are deemed to require a response, they are denied.

23 272. Paragraph 272 is directed to another defendant. Accordingly, LG Display America
24 lacks knowledge or information sufficient to form a belief as to the truth of the allegations
25 contained in Paragraph 272 and on this basis denies those allegations.

26 273. Paragraph 273 consists of Plaintiff's characterizations and conclusions of law, to
27 which no response is required.

28 274. The allegations contained in Paragraph 274 consist of the Plaintiff's conclusions of

1 law, to which no response is required. To the extent that the allegations contained in Paragraph
2 274 are directed to other defendants, LG Display America lacks knowledge or information
3 sufficient to form a belief as to the truth of these allegations and on this basis denies those
4 allegations. To the extent that the allegations in Paragraph 274 are directed to LG Display
5 America and are deemed to require a response, they are denied. LG Display America specifically
6 denies that LG Display America fraudulently concealed the alleged conspiracy.

7 275. The allegations contained in Paragraph 275 consist of the Plaintiff's conclusions of
8 law, to which no response is required. To the extent that the allegations contained in Paragraph
9 275 are directed to other defendants, LG Display America lacks knowledge or information
10 sufficient to form a belief as to the truth of these allegations and on this basis denies those
11 allegations. To the extent that the allegations in Paragraph 275 are directed to LG Display
12 America and are deemed to require a response, they are denied. LG Display America specifically
13 denies that LG Display America fraudulently concealed the alleged conspiracy.

14 276. The allegations contained in Paragraph 276 consist of the Plaintiff's conclusions of
15 law, to which no response is required. To the extent that the allegations contained in Paragraph
16 276 are directed to other defendants, LG Display America lacks knowledge or information
17 sufficient to form a belief as to the truth of these allegations and on this basis denies those
18 allegations. To the extent that the allegations in Paragraph 276 are directed to LG Display
19 America and are deemed to require a response, they are denied.

20 277. The allegations contained in Paragraph 277 consist of the Plaintiff's conclusions of
21 law, to which no response is required. To the extent that the allegations contained in Paragraph
22 277 are directed to other defendants, LG Display America lacks knowledge or information
23 sufficient to form a belief as to the truth of these allegations and on this basis denies those
24 allegations. To the extent that the allegations in Paragraph 277 are directed to LG Display
25 America and are deemed to require a response, they are denied. LG Display America specifically
26 denies that LG Display America fraudulently concealed the alleged conspiracy.

27 278. The allegations contained in Paragraph 278 consist of the Plaintiff's conclusions of
28 law, to which no response is required. To the extent that the allegations contained in Paragraph

1 278 are directed to other defendants, LG Display America lacks knowledge or information
2 sufficient to form a belief as to the truth of these allegations and on this basis denies those
3 allegations. To the extent that the allegations in Paragraph 278 are directed to LG Display
4 America and are deemed to require a response, they are denied.

5 279. The allegations contained in Paragraph 279 consist of the Plaintiff's conclusions of
6 law, to which no response is required. To the extent that the allegations contained in Paragraph
7 279 are directed to other defendants, LG Display America lacks knowledge or information
8 sufficient to form a belief as to the truth of these allegations and on this basis denies those
9 allegations. To the extent that the allegations in Paragraph 279 are directed to LG Display
10 America and are deemed to require a response, they are denied.

11 280. Paragraph 280 consists of Plaintiff's characterization of its claims, to which no
12 response is required.

13 281. The allegations contained in Paragraph 281 consist of the Plaintiff's conclusions of
14 law, to which no response is required. To the extent that the allegations contained in Paragraph
15 281 are directed to other defendants, LG Display America lacks knowledge or information
16 sufficient to form a belief as to the truth of these allegations and on this basis denies those
17 allegations. To the extent that the allegations in Paragraph 281 are directed to LG Display
18 America and are deemed to require a response, they are denied.

19 282. The allegations contained in Paragraph 282 consist of the Plaintiff's conclusions of
20 law, to which no response is required. To the extent that the allegations contained in Paragraph
21 282 are directed to other defendants, LG Display America lacks knowledge or information
22 sufficient to form a belief as to the truth of these allegations and on this basis denies those
23 allegations. To the extent that the allegations in Paragraph 282 are directed to LG Display
24 America and are deemed to require a response, they are denied.

25 283. The allegations contained in Paragraph 283 consist of the Plaintiff's conclusions of
26 law, to which no response is required. To the extent that the allegations contained in Paragraph
27 283 may be deemed to require a response, they are denied.

28 284. The allegations contained in Paragraph 284 consist of the Plaintiff's conclusions of

1 law, to which no response is required. To the extent that the allegations contained in Paragraph
2 284 are directed to other defendants, LG Display America lacks knowledge or information
3 sufficient to form a belief as to the truth of these allegations and on this basis denies those
4 allegations. To the extent that the allegations in Paragraph 284 are directed to LG Display
5 America and are deemed to require a response, they are denied.

6 285. The allegations contained in Paragraph 285 consist of the Plaintiff's conclusions of
7 law, to which no response is required. To the extent that the allegations contained in Paragraph
8 285 are directed to other defendants, LG Display America lacks knowledge or information
9 sufficient to form a belief as to the truth of these allegations and on this basis denies those
10 allegations. To the extent that the allegations contained in Paragraph 285 are directed to LG
11 Display America and may be deemed to require a response, they are denied.

12 286. The allegations contained in Paragraph 286 consist of the Plaintiff's conclusions of
13 law, to which no response is required. To the extent that the allegations contained in Paragraph
14 286 are directed to other defendants, LG Display America lacks knowledge or information
15 sufficient to form a belief as to the truth of these allegations and on this basis denies those
16 allegations. To the extent that the allegations contained in Paragraph 286 are directed to LG
17 Display America and may be deemed to require a response, they are denied.

18 287. Paragraph 287 consists of Plaintiff's characterization of its claims, to which no
19 response is required.

20 288. The allegations contained in Paragraph 288 consist of the Plaintiff's conclusions of
21 law, to which no response is required. To the extent that the allegations contained in Paragraph
22 288 are directed to other defendants, LG Display America lacks knowledge or information
23 sufficient to form a belief as to the truth of these allegations and on this basis denies those
24 allegations. To the extent that the allegations contained in Paragraph 288 are directed to LG
25 Display America and may be deemed to require a response, they are denied.

26 289. LG Display America lacks knowledge or information sufficient to form a belief as
27 to the truth of the allegations in Paragraph 289 and on this basis denies those allegations.

28 290. Paragraph 290 consists of Plaintiff's conclusions of law, to which no response is

1 required.

2 291. To the extent that the allegations contained in Paragraph 291 are directed to other
3 defendants, LG Display America lacks knowledge or information sufficient to form a belief as to
4 the truth of the allegations contained in Paragraph 291 and on this basis denies those allegations.
5 To the extent that the allegations in Paragraph 291 are based on plea agreements, those
6 agreements speak for themselves and no response is required. To the extent that the remaining
7 allegations in Paragraph 291 are deemed to require a response from LG Display America, they
8 are denied.

9 292. The allegations contained in Paragraph 292 consist of the Plaintiff's conclusions of
10 law, to which no response is required. To the extent that the allegations contained in Paragraph
11 292 are directed to other defendants, LG Display America lacks knowledge or information
12 sufficient to form a belief as to the truth of these allegations and on this basis denies those
13 allegations. To the extent that the allegations in Paragraph 292 are directed to LG Display
14 America and are deemed to require a response, they are denied.

15 293. The allegations contained in Paragraph 293 consist of the Plaintiff's conclusions of
16 law, to which no response is required. To the extent that the allegations contained in Paragraph
17 293 are directed to other defendants, LG Display America lacks knowledge or information
18 sufficient to form a belief as to the truth of these allegations and on this basis denies those
19 allegations. To the extent that the allegations in Paragraph 293 are directed to LG Display
20 America and are deemed to require a response, they are denied.

21 294. The allegations contained in Paragraph 294 consist of the Plaintiff's conclusions of
22 law, to which no response is required. To the extent that the allegations contained in Paragraph
23 294 are directed to other defendants, LG Display America lacks knowledge or information
24 sufficient to form a belief as to the truth of these allegations and on this basis denies those
25 allegations. To the extent that the allegations in Paragraph 294 are directed to LG Display
26 America and are deemed to require a response, they are denied.

27 295. The allegations contained in Paragraph 295 consist of the Plaintiff's conclusions of
28 law, to which no response is required. To the extent that the allegations contained in Paragraph

1 295 may be deemed to require a response, they are denied.

2 296. The allegations contained in Paragraph 296 consist of the Plaintiff's conclusions of
3 law, to which no response is required. To the extent that the allegations contained in Paragraph
4 296 are directed to other defendants, LG Display America lacks knowledge or information
5 sufficient to form a belief as to the truth of these allegations and on this basis denies those
6 allegations. To the extent that the allegations in Paragraph 296 are directed to LG Display
7 America and are deemed to require a response, they are denied.

8 297. The allegations contained in Paragraph 297 consist of the Plaintiff's conclusions of
9 law, to which no response is required. To the extent that the allegations contained in Paragraph
10 297 are directed to other defendants, LG Display America lacks knowledge or information
11 sufficient to form a belief as to the truth of these allegations and on this basis denies those
12 allegations. To the extent that the allegations in Paragraph 297 are directed to LG Display
13 America and are deemed to require a response, they are denied.

14 298. The allegations contained in Paragraph 298 consist of the Plaintiff's conclusions of
15 law, to which no response is required. To the extent that the allegations contained in Paragraph
16 298 are directed to other defendants, LG Display America lacks knowledge or information
17 sufficient to form a belief as to the truth of these allegations and on this basis denies those
18 allegations. To the extent that the allegations contained in Paragraph 298 are derived from plea
19 agreements, those agreements speak for themselves and no response is required.

20 299. The allegations contained in Paragraph 299 consist of the Plaintiff's conclusions of
21 law, to which no response is required. To the extent that the allegations contained in Paragraph
22 299 are directed to other defendants, LG Display America lacks knowledge or information
23 sufficient to form a belief as to the truth of these allegations and on this basis denies those
24 allegations. To the extent that the allegations contained in Paragraph 299 are directed to LG
25 Display America and may be deemed to require a response, they are denied.

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PRAYER FOR RELIEF

1 To the extent that the Prayer for Relief may be deemed to require a response, it is denied.

2

3

DEFENSES AND AFFIRMATIVE DEFENSES

4

FIRST DEFENSE

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The Complaint fails to state a claim upon which relief can be granted.

6

SECOND DEFENSE

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The claims set forth in the Complaint are barred by the statute of limitations.

8

THIRD DEFENSE

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Plaintiff has failed to allege fraudulent concealment with particularity.

10

FOURTH DEFENSE

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The conduct alleged by Plaintiff in the Complaint to form the basis of certain of Plaintiff's claims has not had a direct, substantial, and reasonably foreseeable effect on trade or commerce with the United States. The Court therefore lacks subject matter jurisdiction.

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FIFTH DEFENSE

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Plaintiff is barred from recovery of any damages because of and to the extent of its failure to mitigate damages.

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SIXTH DEFENSE

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Plaintiff's claims for damages are barred because the alleged damages, if any, are speculative and because of the impossibility of ascertaining and allocating those alleged damages.

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SEVENTH DEFENSE

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Any injuries or damages Plaintiff may have suffered were caused solely and proximately by the acts and omissions of others.

23

EIGHTH DEFENSE

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Plaintiff's claims are barred by the doctrines of waiver, estoppel, and/or laches.

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NINTH DEFENSE

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To the extent that any actionable conduct occurred, Plaintiff's claims against LG Display America are barred because all such conduct would have been committed by individuals acting *ultra vires*.

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TENTH DEFENSE

Plaintiff passed-on any overcharge it suffered to entities to which it later sold its used products containing TFT-LCD panels.

ELEVENTH DEFENSE

Plaintiff’s claims against LG Display America are barred to the extent that it has agreed to arbitration or chosen a different forum for the resolution of its claims.

TWELFTH DEFENSE

LG Display America withdrew from the alleged conspiracy and therefore is not liable for any injury sustained because of the alleged conspiracy after such withdrawal.

THIRTEENTH DEFENSE

LG Display America incorporates by reference any affirmative defenses asserted by any other defendant in this action.

FOURTEENTH DEFENSE

LG Display America reserves all other affirmative defenses.

WHEREFORE, LG Display America prays as follows:

1. That Plaintiff take nothing by way of the FAC, and the action be dismissed with prejudice;
2. That judgment be entered in favor of LG Display America and against Plaintiff with respect to all causes of action in the FAC;
3. That the Court award LG Display America its attorneys’ fees and all other costs reasonably incurred in defense of this action; and
4. That the Court award such other relief as it may deem just and proper.

Respectfully submitted,

DATED: March 5, 2012

HOLLY A. HOUSE
KEVIN C. McCANN
PAUL HASTINGS LLP

By: _____ /s/ Kevin C. McCann
Kevin C. McCann

Attorneys for Defendant
LG Display America, Inc.