

1 MELVIN R. GOLDMAN (CA SBN 34097)
 MGoldman@mofocom
 2 STEPHEN P. FRECCERO (CA SBN 131093)
 SFreccero@mofocom
 3 DEREK F. FORAN (CA SBN 224569)
 DForan@mofocom
 4 MORRISON & FOERSTER LLP
 425 Market Street
 5 San Francisco, California 94105-2482
 Telephone: 415.268.7000
 6 Facsimile: 415.268.7522

7 Attorneys for Defendants Seiko Epson
 Corporation, Epson Imaging Devices
 8 Corporation and Epson Electronics America, Inc.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

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

This Document Relates to: 3:11-CV-2591 SI

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

Plaintiff,

v.

AU OPTRONICS CORPORATION, *et al.*,

Defendants.

MDL File No.: 3:07-MD-1827-SI
 CASE NO. 11-cv-2591-SI
 MDL NO. 1827

**ANSWER OF DEFENDANTS SEIKO
 EPSON CORPORATION, EPSON
 IMAGING DEVICES
 CORPORATION AND EPSON
 ELECTRONICS AMERICA, INC. TO
 T-MOBILE U.S.A., INC.'S
 AMENDED COMPLAINT FOR
 DAMAGES AND INJUNCTIVE
 RELIEF**

1 Defendants Seiko Epson Corporation (“SEC”), Epson Imaging Devices Corporation
2 (“EID”) and Epson Electronics America, Inc. (“EEA”) (collectively, “Epson Defendants”), by
3 their undersigned attorneys, for their Answer to T-Mobile U.S.A., Inc.’s (“plaintiff”) Amended
4 Complaint (“Complaint”) state:

5 1. To the extent that paragraph 1 may be deemed to require any response, Epson
6 Defendants deny plaintiff’s definition of the term “LCD panels” because the definition comprises
7 a wide variety of items of commerce that appear at many different levels of many different
8 production chains, and that are traded in multiple, separate markets, including multiple, separate
9 markets for different types of LCD panels, and multiple, separate markets for appliances
10 containing multiple separate types of LCD panels. Thus, as defined, the term creates confusion in
11 this paragraph and wherever it is used as part of any subsequent allegation in the Complaint. To
12 the extent that the allegations contained in paragraph 1 of the Complaint are directed to other
13 defendants, Epson Defendants lack the knowledge or information sufficient to form a belief as to
14 the truth of those allegations and on that basis deny each and every such allegation. To the extent
15 that the allegations contained in paragraph 1 of the Complaint are directed to Epson Defendants,
16 Epson Defendants deny each and every such allegation.

17 2. To the extent that paragraph 2 may be deemed to require any response, Epson
18 Defendants deny plaintiff’s definition of the term “product containing those panels” because the
19 definition comprises a wide variety of items of commerce that appear at many different levels of
20 many different production chains, and that are traded in multiple, separate markets, including
21 multiple, separate markets for different types of LCD products, and multiple, separate markets for
22 appliances containing multiple separate types of LCD products. Thus, as defined, the term
23 creates confusion in this paragraph and wherever it is used as part of any subsequent allegation in
24 the Complaint. To the extent that the allegations contained in paragraph 2 of the Complaint are
25 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
26 form a belief as to the truth of those allegations and on that basis deny each and every such
27 allegation. To the extent that the allegations contained in paragraph 2 of the Complaint are
28 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

1 3. To the extent that paragraph 3 may be deemed to require any response, Epson
2 Defendants deny plaintiff’s definition of the terms “TFT-LCD panels,” “STN-LCD panels,”
3 “CSTN-LCD panels,” and “MSTN-LCD panels” because the definitions comprise a wide variety
4 of items of commerce that appear at many different levels of many different production chains,
5 and that are traded in multiple, separate markets, including multiple, separate markets for
6 different types of LCD panels, and multiple, separate markets for appliances containing multiple
7 separate types of LCD panels. Thus, as defined, the terms create confusion in this paragraph and
8 wherever they are used as part of any subsequent allegation in the Complaint. To the extent that
9 the allegations contained in paragraph 3 of the Complaint purports to characterize deposition
10 testimony, such testimony speaks for itself as to its content and requires no further response. To
11 the extent that the allegations contained in paragraph 3 of the Complaint are directed at other
12 defendants, Epson Defendants lack knowledge and information to form a belief as to the truth of
13 those allegations and on that basis deny each and every such allegation. To the extent that the
14 allegations contained in paragraph 3 of the Complaint are directed to Epson Defendants, Epson
15 Defendants deny each and every such allegation.

16 4. To the extent that the allegations contained in paragraph 4 of the Complaint are
17 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
18 form a belief as to the truth of those allegations and on that basis deny each and every such
19 allegation. To the extent that the allegations contained in paragraph 4 of the Complaint are
20 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

21 5. To the extent that the allegations contained in paragraph 5 of the Complaint
22 purport to characterize agreements entered into between several defendants and the Department
23 of Justice (“DOJ”), such agreement speak for themselves as to their contents and require no
24 further response. To the extent that the allegations contained in paragraph 5 of the Complaint are
25 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
26 a belief as to the truth of those allegation and on that basis deny each and every such allegation.
27 To the extent that the allegations contained in paragraph 5 of the Complaint are directed to Epson
28 Defendants, Epson Defendants deny each and every such allegation, except admit that EID

1 entered a guilty plea as set forth in the publicly-filed Plea Agreement in *United States v. Epson*
2 *Imaging Devices Corporation*, N.D. Cal., No. 09-cr-0854, the contents of which speaks for itself
3 and requires no further response.

4 6. To the extent that the allegations contained in paragraph 6 of the Complaint
5 purport to characterize agreements between several defendants and the DOJ, or statements made
6 at plea hearings, such agreements and statements speak for themselves as to their contents and
7 require no further response. To the extent that the allegations contained in paragraph 6 of the
8 Complaint are directed to other defendants, Epson Defendants lack knowledge or information
9 sufficient to form a belief as to the truth of those allegation and on that basis deny each and every
10 such allegation. To the extent that the allegations contained in paragraph 6 of the Complaint are
11 directed to Epson Defendants, Epson Defendants deny each and every such allegation, except to
12 admit that EEA maintained offices and operations in California during the relevant period.

13 7. To the extent that the allegations contained in paragraph 7 of the Complaint are
14 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
15 form a belief as to the truth of those allegations and on that basis deny each and every such
16 allegation. To the extent that the allegations contained in paragraph 7 of the Complaint are
17 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

18 8. To the extent that paragraph 8 of the Complaint do not contain allegations of fact,
19 but rather consists of argument and conclusions of law, Epson Defendants are not required to
20 respond. To the extent that the allegations contained in paragraph 8 of the Complaint are directed
21 to other defendants, Epson Defendants lack the knowledge or information sufficient to form a
22 belief as to the truth of those allegations and on that basis deny each and every such allegation.
23 To the extent that the allegations contained in paragraph 8 of the Complaint are directed to Epson
24 Defendants, Epson Defendants deny each and every such allegation.

25 9. To the extent that paragraph 9 of the Complaint do not contain allegations of fact,
26 but rather consists of argument and conclusions of law, Epson Defendants are not required to
27 respond. To the extent that the allegations contained in paragraph 9 of the Complaint are directed
28 to other defendants, Epson Defendants lack the knowledge or information sufficient to form a

1 belief as to the truth of those allegations and on that basis deny each and every such allegation.

2 To the extent that the allegations contained in paragraph 9 of the Complaint are directed to Epson
3 Defendants, Epson Defendants deny each and every such allegation.

4 10. With respect to paragraph 10 of the Complaint, Epson Defendants are not required
5 to respond because it does not contain any allegations of fact, but rather consists of argument and
6 conclusions of law. To the extent that the allegations contained in paragraph 10 of the Complaint
7 are directed to other defendants, Epson Defendants lack the knowledge or information sufficient
8 to form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 10 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 11. With respect to paragraph 11 of the Complaint, Epson Defendants are not required
12 to respond because it does not contain any allegations of fact, but rather consists of argument and
13 conclusions of law. To the extent that the allegations contained in paragraph 11 of the Complaint
14 are directed to other defendants, Epson Defendants lack the knowledge or information sufficient
15 to form a belief as to the truth of those allegations and on that basis deny each and every such
16 allegation. To the extent that the allegations contained in paragraph 11 of the Complaint are
17 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

18 12. With respect to paragraph 12 of the Complaint, Epson Defendants are not required
19 to respond because it does not contain any allegations of fact, but rather consists of argument and
20 conclusions of law. To the extent that the allegations contained in paragraph 12 of the Complaint
21 are directed to other defendants, Epson Defendants lack the knowledge or information sufficient
22 to form a belief as to the truth of those allegations and on that basis deny each and every such
23 allegation. To the extent that the allegations contained in paragraph 12 of the Complaint are
24 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

25 13. To the extent that paragraph 13 of the Complaint do not contain allegations of fact,
26 but rather consists of argument and conclusions of law, Epson Defendants are not required to
27 respond. To the extent that the allegations contained in paragraph 13 of the Complaint are
28 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to

1 form a belief as to the truth of those allegations and on that basis deny each and every such
2 allegation. To the extent that the allegations contained in paragraph 13 of the Complaint are
3 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

4 14. With respect to paragraph 14 of the Complaint, Epson Defendants are not required
5 to respond because it does not contain any allegations of fact, but rather consists of argument and
6 conclusions of law. To the extent any further response is required, Epson Defendants deny the
7 allegations of paragraph 14.

8 15. With respect to paragraph 15 of the Complaint, Epson Defendants are not required
9 to respond because it does not contain any allegations of fact, but rather consists of argument and
10 conclusions of law. To the extent that the allegations contained in paragraph 15 of the Complaint
11 are directed to other defendants, Epson Defendants lack the knowledge or information sufficient
12 to form a belief as to the truth of those allegations and on that basis deny each and every such
13 allegation. To the extent that the allegations contained in paragraph 15 of the Complaint are
14 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

15 16. With respect to paragraph 16 of the Complaint, Epson Defendants are not required
16 to respond because it does not contain any allegations of fact, but rather consists of argument and
17 conclusions of law. To the extent any further response is required, Epson Defendants deny the
18 allegations of paragraph 16.

19 17. To the extent that any allegations in paragraph 17 may be deemed to require any
20 response, Epson Defendants admit that paragraph 17 generally describes some basic aspects of
21 the nature, technology, and means of manufacturing LCD panels, modules, and appliances
22 containing LCD panels, that some types of LCD panels are incorporated in many appliances,
23 including, but not limited to, computer monitors, televisions, and cellular telephones, and that at
24 various times, different types of LCD panels were used in a wide variety of appliances, including,
25 but not limited to, wireless handsets. Except as specifically admitted herein, Epson Defendants
26 deny the allegations in paragraph 17 of the Complaint.

27 18. To the extent that any allegations in paragraph 18 may be deemed to require any
28 response, Epson Defendants admit that paragraph 18 generally describes some basic aspects of

1 the nature, technology, and means of manufacturing LCD panels, modules, and appliances
2 containing LCD panels, that some types of LCD panels are incorporated in many appliances,
3 including, but not limited to, computer monitors, televisions, and cellular telephones, and that at
4 various times, different types of LCD panels were used in a wide variety of appliances, including,
5 but not limited to, wireless handsets. To the extent that the allegations contained in paragraph 18
6 of the Complaint are directed towards other defendants, Epson Defendants lack knowledge or
7 information sufficient to form a belief as to the truth of those allegations and on that basis denies
8 each and every such allegation. To the extent that the allegations contained in paragraph 18 are
9 directed at Epson Defendants, Epson Defendants deny each and every such allegation.

10 19. With respect to paragraph 19 of the Complaint, Epson Defendants are not
11 required to respond because it does not contain any allegations of fact, but rather consists of
12 explanations of terminology.

13 20. With respect to paragraph 20 of the Complaint, Epson Defendants are not required
14 to respond because it does not contain any allegations of fact, but rather consists of explanations
15 of terminology.

16 21. With respect to paragraph 21 of the Complaint, Epson Defendants are not required
17 to respond because it does not contain any allegations of fact, but rather consists of explanations
18 of terminology.

19 22. To the extent that the allegations contained in paragraph 22 of the Complaint are
20 directed towards other defendants, Epson Defendants lack knowledge or information sufficient to
21 form a belief as to the truth of those allegations and on that basis denies each and every such
22 allegation. To the extent that the allegations contained in paragraph 22 are directed at Epson
23 Defendants, Epson Defendants deny each and every such allegation.

24 23. To the extent that the allegations contained in paragraph 23 of the Complaint are
25 directed towards other defendants, Epson Defendants lack knowledge or information sufficient to
26 form a belief as to the truth of those allegations and on that basis denies each and every such
27 allegation. To the extent that the allegations contained in paragraph 23 are directed at Epson
28 Defendants, Epson Defendants deny each and every such allegation.

1 24. To the extent that the allegations contained in paragraph 24 of the Complaint are
2 directed towards other defendants, Epson Defendants lack knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis denies each and every such
4 allegation. To the extent that the allegations contained in paragraph 24 are directed at Epson
5 Defendants, Epson Defendants deny each and every such allegation.

6 25. Epson Defendants lack knowledge or information sufficient to form a belief as to
7 the truth of the allegations contained in paragraph 25, and on that basis deny each and every such
8 allegation.

9 26. Epson Defendants lack knowledge or information sufficient to form a belief as to
10 the truth of the allegations contained in paragraph 26, and on that basis deny each and every such
11 allegation.

12 27. To the extent that the allegations contained in paragraph 27 of the Complaint are
13 directed towards other defendants, Epson Defendants lack knowledge or information sufficient to
14 form a belief as to the truth of those allegations and on that basis denies each and every such
15 allegation. To the extent that the allegations contained in paragraph 27 are directed at Epson
16 Defendants, Epson Defendants deny each and every such allegation.

17 28. With respect to paragraph 28 of the Complaint, Epson Defendants are not required
18 to respond because it does not contain any allegations of fact, but rather consists of argument and
19 conclusions of law.

20 29. Epson Defendants lack the knowledge or information sufficient to form a belief as
21 to the truth of the allegations contained in paragraph 29 of the Complaint and on that basis deny
22 each and every such allegation.

23 30. Epson Defendants lack the knowledge or information sufficient to form a belief as
24 to the truth of the allegations contained in paragraph 30 of the Complaint and on that basis deny
25 each and every such allegation.

26 31. With respect to the allegations contained in paragraph 31 of the Complaint, Epson
27 Defendants are not required to respond because it does not contain any allegation of fact, but
28 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to

1 the allegations in paragraph 31 of the Complaint, Epson Defendants lack the knowledge or
2 information sufficient to form a belief as to the truth of the allegations contained in such
3 paragraph, and on that basis deny each and every allegation contained in such paragraph.

4 32. Epson Defendants lack the knowledge or information sufficient to form a belief as
5 to the truth of the allegations contained in paragraph 32 of the Complaint and on that basis deny
6 each and every such allegation.

7 33. Epson Defendants lack the knowledge or information sufficient to form a belief as
8 to the truth of the allegations contained in paragraph 33 of the Complaint and on that basis deny
9 each and every such allegation.

10 34. Epson Defendants lack the knowledge or information sufficient to form a belief as
11 to the truth of the allegations contained in paragraph 34 of the Complaint and on that basis deny
12 each and every such allegation.

13 35. Epson Defendants lack the knowledge or information sufficient to form a belief as
14 to the truth of the allegations contained in paragraph 35 of the Complaint and on that basis deny
15 each and every such allegation.

16 36. Epson Defendants lack the knowledge or information sufficient to form a belief as
17 to the truth of the allegations contained in paragraph 36 of the Complaint and on that basis deny
18 each and every such allegation.

19 37. Epson Defendants lack the knowledge or information sufficient to form a belief as
20 to the truth of the allegations contained in paragraph 37 of the Complaint and on that basis deny
21 each and every such allegation.

22 38. With respect to the allegations contained in paragraph 38 of the Complaint, Epson
23 Defendants are not required to respond because it does not contain any allegation of fact, but
24 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
25 the allegations in paragraph 38 of the Complaint, Epson Defendants lack the knowledge or
26 information sufficient to form a belief as to the truth of the allegations contained in such
27 paragraph, and on that basis deny each and every allegation contained in such paragraph.
28

1 39. Epson Defendants lack the knowledge or information sufficient to form a belief as
2 to the truth of the allegations contained in paragraph 39 of the Complaint and on that basis deny
3 each and every such allegation.

4 40. Epson Defendants lack the knowledge or information sufficient to form a belief as
5 to the truth of the allegations contained in paragraph 40 of the Complaint and on that basis deny
6 each and every such allegation.

7 41. Epson Defendants lack the knowledge or information sufficient to form a belief as
8 to the truth of the allegations contained in paragraph 41 of the Complaint and on that basis deny
9 each and every such allegation.

10 42. With respect to the allegations contained in paragraph 42 of the Complaint, Epson
11 Defendants are not required to respond because it does not contain any allegation of fact, but
12 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
13 the allegations in paragraph 42 of the Complaint, Epson Defendants lack the knowledge or
14 information sufficient to form a belief as to the truth of the allegations contained in such
15 paragraph, and on that basis deny each and every allegation contained in such paragraph.

16 43. With respect to the allegations contained in paragraph 43 of the Complaint, Epson
17 Defendants are not required to respond because it does not contain any allegation of fact, but
18 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
19 the allegations in paragraph 43 of the Complaint, Epson Defendants lack the knowledge or
20 information sufficient to form a belief as to the truth of the allegations contained in such
21 paragraph, and on that basis deny each and every allegation contained in such paragraph.

22 44. Answering the allegations contained in paragraph 44 of the Complaint, Epson
23 Defendants deny each and every allegation, except admit that Seiko Epson Corporation sold LCD
24 panels or modules containing LCD panels, and these panels or modules were shipped to multiple
25 locations worldwide, including the United States.

26 45. Answering the allegations contained in paragraph 45 of the Complaint, Epson
27 Defendants deny each and every allegation contained in such paragraph, except admit that Sanyo
28 Epson Imaging Devices Corporation was formed as a joint venture co-owned by Sanyo Electric

1 Co., Ltd. and Seiko Epson Corporation, admit that as of December 28, 2006, Sanyo Epson
2 Imaging Devices Corporation became a wholly-owned subsidiary of Seiko Epson Corporation
3 and changed its name to Epson Imaging Devices Corporation, and further admit that between
4 October 1, 2004 and December 28, 2006, Sanyo Epson Imaging Devices Corporation sold LCD
5 panels or modules containing LCD panels, and these panels or modules were shipped to multiple
6 locations worldwide, including the United States.

7 46. Answering the allegations contained in paragraph 46 of the Complaint, Epson
8 Defendants deny each and every allegation contained in such paragraph, except admit that EEA is
9 a wholly-owned subsidiary of US Epson Inc., and US Epson, Inc. is in turn a wholly-owned
10 subsidiary of Seiko Epson Corporation, and admit that EEA is a California corporation with a
11 principal place of business in San Jose, California, and admit that EEA re-sold in the United
12 States LCD panels or modules containing LCD panels manufactured outside the United States by
13 Sanyo Epson Imaging Devices Corporation, which later, on December 28, 2006 became a
14 wholly-owned subsidiary of Seiko Epson Corporation known as Epson Imaging Devices
15 Corporation.

16 47. With respect to the allegations contained in the first sentence of paragraph 47 of
17 the Complaint, Epson Defendants are not required to respond because it does not contain any
18 allegation of fact, but rather plaintiff's explanation of terminology, i.e. how plaintiff uses the term
19 "Epson" in its complaint. Each Epson Defendant denies each and every allegation regarding it in
20 paragraph 47 of the Complaint, and, as to each and every allegation regarding another Epson
21 Defendant, or any other defendant, each Epson Defendant lacks the knowledge or information
22 sufficient to form a belief as to the truth of those allegations, and on that basis denies each and
23 every such allegation in paragraph 47.

24 48. Epson Defendants lack the knowledge or information sufficient to form a belief as
25 to the truth of the allegations contained in paragraph 48 of the Complaint and on that basis deny
26 each and every such allegation.

1 49. Epson Defendants lack the knowledge or information sufficient to form a belief as
2 to the truth of the allegations contained in paragraph 49 of the Complaint and on that basis deny
3 each and every such allegation.

4 50. Epson Defendants lack the knowledge or information sufficient to form a belief as
5 to the truth of the allegations contained in paragraph 50 of the Complaint and on that basis deny
6 each and every such allegation.

7 51. Epson Defendants lack the knowledge or information sufficient to form a belief as
8 to the truth of the allegations contained in paragraph 51 of the Complaint and on that basis deny
9 each and every such allegation.

10 52. With respect to the allegations contained in paragraph 52 of the Complaint, Epson
11 Defendants are not required to respond because it does not contain any allegation of fact, but
12 rather plaintiff's explanation of terminology.

13 53. Epson Defendants lack the knowledge or information sufficient to form a belief as
14 to the truth of the allegations contained in paragraph 53 of the Complaint and on that basis deny
15 each and every such allegation.

16 54. Epson Defendants lack the knowledge or information sufficient to form a belief as
17 to the truth of the allegations contained in paragraph 54 of the Complaint and on that basis deny
18 each and every such allegation.

19 55. With respect to the allegations contained in paragraph 55 of the Complaint, Epson
20 Defendants are not required to respond because it does not contain any allegation of fact, but
21 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
22 the allegations in paragraph 55 of the Complaint, Epson Defendants lack the knowledge or
23 information sufficient to form a belief as to the truth of the allegations contained in such
24 paragraph, and on that basis deny each and every allegation contained in such paragraph.

25 56. Epson Defendants lack the knowledge or information sufficient to form a belief as
26 to the truth of the allegations contained in paragraph 56 of the Complaint and on that basis deny
27 each and every such allegation.

28

1 57. To the extent that the allegations contained in paragraph 57 of the Complaint
2 purport to characterize an agreement between the DOJ and LG Display, such agreement speaks
3 for itself as to its contents and requires no further response. To the extent that the allegations
4 contained in paragraph 57 of the Complaint are directed to other defendants, Epson Defendants
5 lack knowledge or information sufficient to form a belief as to the truth of the allegations and on
6 that basis deny each and every such allegation. To the extent that the allegations contained in
7 paragraph 57 are directed to Epson Defendants, Epson Defendants deny each and every such
8 allegation.

9 58. To the extent that the allegations contained in paragraph 58 of the Complaint are
10 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
11 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
12 To the extent that the allegations contained in paragraph 58 are directed to Epson Defendants,
13 Epson Defendants deny each and every such allegation.

14 59. Epson Defendants lack the knowledge or information sufficient to form a belief as
15 to the truth of the allegations contained in paragraph 59 of the Complaint and on that basis deny
16 each and every such allegation.

17 60. Epson Defendants lack the knowledge or information sufficient to form a belief as
18 to the truth of the allegations contained in paragraph 60 of the Complaint and on that basis deny
19 each and every such allegation.

20 61. Epson Defendants lack the knowledge or information sufficient to form a belief as
21 to the truth of the allegations contained in paragraph 61 of the Complaint and on that basis deny
22 each and every such allegation.

23 62. Epson Defendants lack the knowledge or information sufficient to form a belief as
24 to the truth of the allegations contained in paragraph 62 of the Complaint and on that basis deny
25 each and every such allegation.

26 63. Epson Defendants lack the knowledge or information sufficient to form a belief as
27 to the truth of the allegations contained in paragraph 63 of the Complaint and on that basis deny
28 each and every such allegation.

1 64. With respect to the allegations contained in paragraph 64 of the Complaint, Epson
2 Defendants are not required to respond because it does not contain any allegation of fact, but
3 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
4 the allegations in paragraph 64 of the Complaint, Epson Defendants lack the knowledge or
5 information sufficient to form a belief as to the truth of the allegations contained in such
6 paragraph, and on that basis deny each and every allegation contained in such paragraph.

7 65. Epson Defendants lack the knowledge or information sufficient to form a belief as
8 to the truth of the allegations contained in paragraph 65 of the Complaint and on that basis deny
9 each and every such allegation.

10 66. Epson Defendants lack the knowledge or information sufficient to form a belief as
11 to the truth of the allegations contained in paragraph 66 of the Complaint and on that basis deny
12 each and every such allegation.

13 67. Epson Defendants lack the knowledge or information sufficient to form a belief as
14 to the truth of the allegations contained in paragraph 67 of the Complaint and on that basis deny
15 each and every such allegation.

16 68. To the extent that the allegations contained in paragraph 68 of the Complaint
17 purport to characterize investigations by governmental entities, such investigations speak for
18 themselves as to their contents and require no further response. To the extent that a response is
19 deemed required to the allegations in paragraph 68 of the Complaint, Epson Defendants lack the
20 knowledge or information sufficient to form a belief as to the truth of the allegations contained in
21 such paragraph, and on that basis deny each and every such allegation.

22 69. With respect to the allegations contained in paragraph 69 of the Complaint, Epson
23 Defendants are not required to respond because it does not contain any allegation of fact, but
24 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
25 the allegations in paragraph 69 of the Complaint, Epson Defendants lack the knowledge or
26 information sufficient to form a belief as to the truth of the allegations contained in such
27 paragraph, and on that basis deny each and every allegation contained in such paragraph.
28

1 70. To the extent that any allegations in paragraph 70 may be deemed to require any
2 response, Epson Defendants admit that Sanyo Epson Imaging Devices Corporation was formed in
3 2004, and that Sanyo Epson Imaging Devices Corporation later became Epson Imaging Devices
4 Corporation. Except as specifically admitted herein, Epson Defendants lack the knowledge or
5 information sufficient to form a belief as to the truth of the allegations contained in such
6 paragraph, and on that basis deny each and every allegation contained in such paragraph.

7 71. With respect to the allegations contained in paragraph 71 of the Complaint, Epson
8 Defendants are not required to respond because it does not contain any allegation of fact, but
9 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
10 the allegations in paragraph 71 of the Complaint, Epson Defendants lack the knowledge or
11 information sufficient to form a belief as to the truth of the allegations contained in such
12 paragraph, and on that basis deny each and every allegation contained in such paragraph.

13 72. Epson Defendants lack the knowledge or information sufficient to form a belief as
14 to the truth of the allegations contained in paragraph 72 of the Complaint and on that basis deny
15 each and every such allegation.

16 73. Epson Defendants lack the knowledge or information sufficient to form a belief as
17 to the truth of the allegations contained in paragraph 73 of the Complaint and on that basis deny
18 each and every such allegation.

19 74. With respect to the allegations contained in paragraph 74 of the Complaint, Epson
20 Defendants are not required to respond because it does not contain any allegation of fact, but
21 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
22 the allegations in paragraph 74 of the Complaint, Epson Defendants lack the knowledge or
23 information sufficient to form a belief as to the truth of the allegations contained in such
24 paragraph, and on that basis deny each and every allegation contained in such paragraph.

25 75. Epson Defendants lack the knowledge or information sufficient to form a belief as
26 to the truth of the allegations contained in paragraph 75 of the Complaint and on that basis deny
27 each and every such allegation.

1 76. Epson Defendants lack the knowledge or information sufficient to form a belief as
2 to the truth of the allegations contained in paragraph 76 of the Complaint and on that basis deny
3 each and every such allegation.

4 77. Epson Defendants lack the knowledge or information sufficient to form a belief as
5 to the truth of the allegations contained in paragraph 77 of the Complaint and on that basis deny
6 each and every such allegation.

7 78. Epson Defendants lack the knowledge or information sufficient to form a belief as
8 to the truth of the allegations contained in paragraph 78 of the Complaint and on that basis deny
9 each and every such allegation.

10 79. With respect to the allegations contained in paragraph 79 of the Complaint, Epson
11 Defendants are not required to respond because it does not contain any allegation of fact, but
12 rather plaintiff's explanation of terminology. To the extent that a response is deemed required to
13 the allegations in paragraph 79 of the Complaint, Epson Defendants lack the knowledge or
14 information sufficient to form a belief as to the truth of the allegations contained in such
15 paragraph, and on that basis deny each and every allegation contained in such paragraph.

16 80. To the extent that the allegations contained in paragraph 80 of the Complaint are
17 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
18 form a belief as to the truth of those allegations and on that basis deny each and every such
19 allegation. To the extent that the allegations contained in paragraph 80 of the Complaint are
20 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

21 81. To the extent that the allegations contained in paragraph 81 of the Complaint are
22 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
23 form a belief as to the truth of those allegations and on that basis deny each and every such
24 allegation. To the extent that the allegations contained in paragraph 81 of the Complaint are
25 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

26 82. To the extent that the allegations contained in paragraph 82 of the Complaint are
27 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
28 form a belief as to the truth of those allegations and on that basis deny each and every such

1 allegation. To the extent that the allegations contained in paragraph 82 of the Complaint are
2 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

3 83. To the extent that the allegations contained in paragraph 83 of the Complaint are
4 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
5 form a belief as to the truth of those allegations and on that basis deny each and every such
6 allegation. To the extent that the allegations contained in paragraph 83 of the Complaint are
7 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

8 84. To the extent that the allegations contained in paragraph 84 of the Complaint are
9 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
10 form a belief as to the truth of those allegations and on that basis deny each and every such
11 allegation. To the extent that the allegations contained in paragraph 84 of the Complaint are
12 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

13 85. To the extent that any allegations in paragraph 85 may be deemed to require any
14 response, Epson Defendants admit that paragraph 85 generally describes some basic aspects of
15 the nature, technology, and means of manufacturing LCD panels, modules, and appliances
16 containing LCD panels, that some types of LCD panels are incorporated in many appliances,
17 including, but not limited to, computer monitors, televisions, and cellular telephones, and that at
18 various times, different types of LCD panels were used in a wide variety of appliances, including,
19 but not limited to, wireless handsets. Except as specifically admitted herein, Epson Defendants
20 deny the allegations in paragraph 85 of the Complaint.

21 86. With respect to paragraph 86 of the Complaint, Epson Defendants deny any
22 allegation contained in such paragraph that there is a single “demand for LCD Panels” or
23 “demand for LCD Products.” The terms are undefined, argumentative, and counterintuitive,
24 given that there is no single market for LCD panels and products containing LCD panels, but
25 rather there are multiple separate markets for LCD panels and multiple separate markets for
26 products containing LCD panels. Thus, as defined, the terms “demand for LCD Panels” and
27 “demand for LCD Products” creates confusion in this paragraph and wherever they are used as
28

1 part of any subsequent allegation in the Complaint. Further responding to the allegations in
2 paragraph 86, Epson Defendants deny each and every allegation contained in such paragraph.

3 87. With respect to paragraph 87 of the Complaint, Epson Defendants deny any
4 allegation contained in such paragraph that there is a single “market for LCD Panels.” The term
5 “market for LCD Panels” is undefined, argumentative, and counterintuitive, given that there is no
6 single market for LCD panels and products containing LCD panels, but rather there are multiple
7 separate markets for LCD panels and multiple separate markets for products containing LCD
8 panels. Thus, as defined, the term “market for LCD Panels” creates confusion in this paragraph
9 and wherever it is used as part of any subsequent allegation in the Complaint. Further responding
10 to the allegations in paragraph 87, Epson Defendants deny each and every allegation contained in
11 such paragraph.

12 88. With respect to paragraph 88 of the Complaint, Epson Defendants deny any
13 allegation contained in such paragraph that there is a single “market for LCD Products.” The
14 term “market for LCD Products” is undefined, argumentative, and counterintuitive, given that
15 there is no single market for LCD panels and products containing LCD panels, but rather there are
16 multiple separate markets for LCD panels and multiple separate markets for products containing
17 LCD panels. Thus, as defined, the term “market for LCD Products” creates confusion in this
18 paragraph and wherever it is used as part of any subsequent allegation in the Complaint. Further
19 responding to the allegations in paragraph 88, Epson Defendants deny each and every allegation
20 contained in such paragraph.

21 89. To the extent that any allegations in paragraph 89 may be deemed to require any
22 response, Epson Defendants admit that paragraph 89 generally describes some basic aspects of
23 the nature, technology, and means of manufacturing LCD panels, modules, and appliances
24 containing LCD panels, that some types of LCD panels are incorporated in many appliances,
25 including, but not limited to, computer monitors, televisions, and cellular telephones, and that at
26 various times, different types of LCD panels were used in a wide variety of appliances, including,
27 but not limited to, wireless handsets. Except as specifically admitted herein, Epson Defendants
28 deny the allegations in paragraph 89 of the Complaint.

1 90. To the extent that the allegations contained in paragraph 90 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 90 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 91. To the extent that the allegations contained in paragraph 91 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 91 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 92. To the extent that the allegations contained in paragraph 92 of the Complaint are
12 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
13 form a belief as to the truth of those allegations and on that basis deny each and every such
14 allegation. To the extent that the allegations contained in paragraph 92 of the Complaint are
15 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

16 93. To the extent that the allegations contained in paragraph 93 of the Complaint are
17 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
18 form a belief as to the truth of those allegations and on that basis deny each and every such
19 allegation. To the extent that the allegations contained in paragraph 93 of the Complaint are
20 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

21 94. To the extent that the allegations contained in paragraph 94 of the Complaint are
22 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
23 form a belief as to the truth of those allegations and on that basis deny each and every such
24 allegation. To the extent that the allegations contained in paragraph 94 of the Complaint are
25 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

26 95. To the extent that the allegations contained in paragraph 95 of the Complaint are
27 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
28 form a belief as to the truth of those allegations and on that basis deny each and every such

1 allegation. To the extent that the allegations contained in paragraph 95 of the Complaint are
2 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

3 96. To the extent that the allegations contained in paragraph 96 of the Complaint are
4 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
5 form a belief as to the truth of those allegations and on that basis deny each and every such
6 allegation. To the extent that the allegations contained in paragraph 96 of the Complaint are
7 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

8 97. To the extent that the allegations contained in paragraph 97 of the Complaint are
9 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
10 form a belief as to the truth of those allegations and on that basis deny each and every such
11 allegation. To the extent that the allegations contained in paragraph 97 of the Complaint are
12 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

13 98. To the extent that the allegations contained in paragraph 98 of the Complaint
14 purport to characterize documents produced in discovery, such documents speak for themselves
15 as to their contents and require no further response. To the extent that the allegations contained in
16 paragraph 98 of the Complaint are directed to other defendants, Epson Defendants lack the
17 knowledge or information sufficient to form a belief as to the truth of those allegations and on
18 that basis deny each and every such allegation. To the extent that the allegations contained in
19 paragraph 98 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
20 and every such allegation.

21 99. To the extent that the allegations contained in paragraph 99 of the Complaint
22 purport to characterize documents produced in discovery, such documents speak for themselves
23 as to their contents and require no further response. To the extent that the allegations contained in
24 paragraph 99 of the Complaint are directed to other defendants, Epson Defendants lack the
25 knowledge or information sufficient to form a belief as to the truth of those allegations and on
26 that basis deny each and every such allegation. To the extent that the allegations contained in
27 paragraph 99 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
28 and every such allegation.

1 100. To the extent that the allegations contained in paragraph 100 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 100 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 101. To the extent that the allegations contained in paragraph 101 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 101 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 102. To the extent that the allegations contained in paragraph 102 of the Complaint
12 purport to characterize deposition testimony, such testimony speaks for itself as to its contents
13 and requires no further response. To the extent that the allegations contained in paragraph 102 of
14 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
15 information sufficient to form a belief as to the truth of those allegations and on that basis deny
16 each and every such allegation. To the extent that the allegations contained in paragraph 102 of
17 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
18 allegation.

19 103. To the extent that the allegations contained in paragraph 103 of the Complaint
20 purport to characterize deposition testimony, such testimony speaks for itself as to its contents
21 and requires no further response. To the extent that the allegations contained in paragraph 103 of
22 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
23 information sufficient to form a belief as to the truth of those allegations and on that basis deny
24 each and every such allegation. To the extent that the allegations contained in paragraph 103 of
25 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
26 allegation.

27 104. To the extent that the allegations contained in paragraph 104 of the Complaint
28 purport to characterize deposition testimony, such testimony speaks for itself as to its contents

1 and requires no further response. To the extent that the allegations contained in paragraph 104 of
2 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
3 information sufficient to form a belief as to the truth of those allegations and on that basis deny
4 each and every such allegation. To the extent that the allegations contained in paragraph 104 of
5 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
6 allegation.

7 105. To the extent that the allegations contained in paragraph 105 of the Complaint
8 purport to characterize deposition testimony, such testimony speaks for itself as to its contents
9 and requires no further response. To the extent that the allegations contained in paragraph 105 of
10 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
11 information sufficient to form a belief as to the truth of those allegations and on that basis deny
12 each and every such allegation. To the extent that the allegations contained in paragraph 105 of
13 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
14 allegation.

15 106. To the extent that the allegations contained in paragraph 106 of the Complaint are
16 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
17 form a belief as to the truth of those allegations and on that basis deny each and every such
18 allegation. To the extent that the allegations contained in paragraph 106 of the Complaint are
19 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

20 107. To the extent that the allegations contained in paragraph 107 of the Complaint
21 purport to characterize documents produced in discovery, such documents speak for themselves
22 as to their contents and require no further response. To the extent that the allegations contained in
23 paragraph 107 of the Complaint are directed to other defendants, Epson Defendants lack the
24 knowledge or information sufficient to form a belief as to the truth of those allegations and on
25 that basis deny each and every such allegation. To the extent that the allegations contained in
26 paragraph 107 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
27 and every such allegation.

1 108. To the extent that the allegations contained in paragraph 108 of the Complaint
2 purport to characterize documents produced in discovery, such documents speak for themselves
3 as to their contents and require no further response. To the extent that the allegations contained in
4 paragraph 108 of the Complaint are directed to other defendants, Epson Defendants lack the
5 knowledge or information sufficient to form a belief as to the truth of those allegations and on
6 that basis deny each and every such allegation. To the extent that the allegations contained in
7 paragraph 108 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
8 and every such allegation.

9 109. To the extent that the allegations contained in paragraph 109 of the Complaint
10 purport to characterize documents produced in discovery, such documents speak for themselves
11 as to their contents and require no further response. To the extent that the allegations contained in
12 paragraph 109 of the Complaint are directed to other defendants, Epson Defendants lack the
13 knowledge or information sufficient to form a belief as to the truth of those allegations and on
14 that basis deny each and every such allegation. To the extent that the allegations contained in
15 paragraph 109 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
16 and every such allegation.

17 110. To the extent that the allegations contained in paragraph 110 of the Complaint
18 purport to characterize documents produced in discovery, such documents speak for themselves
19 as to their contents and require no further response. To the extent that the allegations contained in
20 paragraph 110 of the Complaint are directed to other defendants, Epson Defendants lack the
21 knowledge or information sufficient to form a belief as to the truth of those allegations and on
22 that basis deny each and every such allegation. To the extent that the allegations contained in
23 paragraph 110 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
24 and every such allegation.

25 111. To the extent that the allegations contained in paragraph 111 of the Complaint
26 purport to characterize documents produced in discovery, such documents speak for themselves
27 as to their contents and require no further response. To the extent that the allegations contained in
28 paragraph 111 of the Complaint are directed to other defendants, Epson Defendants lack the

1 knowledge or information sufficient to form a belief as to the truth of those allegations and on
2 that basis deny each and every such allegation. To the extent that the allegations contained in
3 paragraph 111 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
4 and every such allegation.

5 112. To the extent that the allegations contained in paragraph 112 of the Complaint
6 purport to characterize documents produced in discovery, such documents speak for themselves
7 as to their contents and require no further response. To the extent that the allegations contained in
8 paragraph 112 of the Complaint are directed to other defendants, Epson Defendants lack the
9 knowledge or information sufficient to form a belief as to the truth of those allegations and on
10 that basis deny each and every such allegation. To the extent that the allegations contained in
11 paragraph 112 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
12 and every such allegation.

13 113. To the extent that the allegations contained in paragraph 113 of the Complaint are
14 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
15 form a belief as to the truth of those allegations and on that basis deny each and every such
16 allegation. To the extent that the allegations contained in paragraph 113 of the Complaint are
17 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

18 114. To the extent that the allegations contained in paragraph 114 of the Complaint are
19 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
20 form a belief as to the truth of those allegations and on that basis deny each and every such
21 allegation. To the extent that the allegations contained in paragraph 114 of the Complaint are
22 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

23 115. To the extent that the allegations contained in paragraph 115 of the Complaint are
24 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
25 form a belief as to the truth of those allegations and on that basis deny each and every such
26 allegation. To the extent that the allegations contained in paragraph 115 of the Complaint are
27 directed to Epson Defendants, Epson Defendants deny each and every such allegation.
28

1 116. To the extent that the allegations contained in paragraph 116 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 116 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 117. To the extent that the allegations contained in paragraph 117 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 117 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 118. To the extent that the allegations contained in paragraph 118 of the Complaint are
12 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
13 form a belief as to the truth of those allegations and on that basis deny each and every such
14 allegation. To the extent that the allegations contained in paragraph 118 of the Complaint are
15 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

16 119. To the extent that the allegations contained in paragraph 119 of the Complaint are
17 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
18 form a belief as to the truth of those allegations and on that basis deny each and every such
19 allegation. To the extent that the allegations contained in paragraph 119 of the Complaint are
20 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

21 120. To the extent that the allegations contained in paragraph 120 of the Complaint are
22 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
23 form a belief as to the truth of those allegations and on that basis deny each and every such
24 allegation. To the extent that the allegations contained in paragraph 120 of the Complaint are
25 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

26 121. To the extent that the allegations contained in paragraph 121 of the Complaint are
27 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
28 form a belief as to the truth of those allegations and on that basis deny each and every such

1 allegation. To the extent that the allegations contained in paragraph 121 of the Complaint are
2 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

3 122. To the extent that the allegations contained in paragraph 122 of the Complaint are
4 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
5 form a belief as to the truth of those allegations and on that basis deny each and every such
6 allegation. To the extent that the allegations contained in paragraph 122 of the Complaint are
7 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

8 123. To the extent that the allegations contained in paragraph 123 of the Complaint are
9 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
10 form a belief as to the truth of those allegations and on that basis deny each and every such
11 allegation. To the extent that the allegations contained in paragraph 123 of the Complaint are
12 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

13 124. To the extent that the allegations contained in paragraph 124 of the Complaint are
14 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
15 form a belief as to the truth of those allegations and on that basis deny each and every such
16 allegation. To the extent that the allegations contained in paragraph 124 of the Complaint are
17 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

18 125. To the extent that the allegations contained in paragraph 125 of the Complaint
19 purport to characterize deposition testimony, such testimony speaks for itself as to its content and
20 requires no further response. To the extent that the allegations contained in paragraph 125 of the
21 Complaint are directed to other defendants, Epson Defendants lack the knowledge or information
22 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
23 every such allegation. To the extent that the allegations contained in paragraph 125 of the
24 Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
25 allegation.

26 126. To the extent that the allegations contained in paragraph 126 of the Complaint
27 purport to characterize deposition testimony, such testimony speaks for itself as to its content and
28 requires no further response. To the extent that the allegations contained in paragraph 126 of the

1 Complaint are directed to other defendants, Epson Defendants lack the knowledge or information
2 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
3 every such allegation. To the extent that the allegations contained in paragraph 126 of the
4 Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
5 allegation.

6 127. To the extent that the allegations contained in paragraph 127 of the Complaint
7 purport to characterize documents produced in discovery, such documents speak for themselves
8 as to their contents and require no further response. To the extent that the allegations contained in
9 paragraph 127 of the Complaint are directed to other defendants, Epson Defendants lack the
10 knowledge or information sufficient to form a belief as to the truth of those allegations and on
11 that basis deny each and every such allegation. To the extent that the allegations contained in
12 paragraph 127 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
13 and every such allegation.

14 128. To the extent that the allegations contained in paragraph 128 of the Complaint are
15 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
16 form a belief as to the truth of those allegations and on that basis deny each and every such
17 allegation. To the extent that the allegations contained in paragraph 128 of the Complaint are
18 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

19 129. To the extent that the allegations contained in paragraph 129 of the Complaint are
20 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
21 form a belief as to the truth of those allegations and on that basis deny each and every such
22 allegation. To the extent that the allegations contained in paragraph 129 of the Complaint are
23 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

24 130. To the extent that the allegations contained in paragraph 130 of the Complaint are
25 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
26 form a belief as to the truth of those allegations and on that basis deny each and every such
27 allegation. To the extent that the allegations contained in paragraph 130 of the Complaint are
28 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

1 131. To the extent that the allegations contained in paragraph 131 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 131 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 132. To the extent that the allegations contained in paragraph 132 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 132 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 133. To the extent that the allegations contained in paragraph 133 of the Complaint are
12 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
13 form a belief as to the truth of those allegations and on that basis deny each and every such
14 allegation. To the extent that the allegations contained in paragraph 133 of the Complaint are
15 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

16 134. To the extent that the allegations contained in paragraph 134 of the Complaint are
17 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
18 form a belief as to the truth of those allegations and on that basis deny each and every such
19 allegation. To the extent that the allegations contained in paragraph 134 of the Complaint are
20 directed to Epson Defendants, Epson Defendants deny each and every such allegation, except
21 admit that that EID entered into a guilty plea as set forth in the publicly-filed Plea Agreement in
22 *United States v. Epson Imaging Devices Corporation*, N.D. Cal., No. 09-cr-0854, the contents of
23 which speaks for itself and requires no further response.

24 135. To the extent that the allegations contained in paragraph 135 of the Complaint are
25 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
26 form a belief as to the truth of those allegations and on that basis deny each and every such
27 allegation. To the extent that the allegations contained in paragraph 135 of the Complaint are
28 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

1 136. To the extent that the allegations contained in paragraph 136 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 136 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 137. To the extent that the allegations contained in paragraph 137 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 137 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 138. To the extent that the allegations contained in paragraph 138 of the Complaint are
12 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
13 form a belief as to the truth of those allegations and on that basis deny each and every such
14 allegation. To the extent that the allegations contained in paragraph 138 of the Complaint are
15 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

16 139. To the extent that the allegations contained in paragraph 139 of the Complaint are
17 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
18 form a belief as to the truth of those allegations and on that basis deny each and every such
19 allegation. To the extent that the allegations contained in paragraph 139 of the Complaint are
20 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

21 140. To the extent that the allegations contained in paragraph 140 of the Complaint are
22 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
23 form a belief as to the truth of those allegations and on that basis deny each and every such
24 allegation. To the extent that the allegations contained in paragraph 140 of the Complaint are
25 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

26 141. To the extent that the allegations contained in paragraph 141 of the Complaint
27 purport to characterize agreements between the DOJ and several defendants, such agreements
28 speak for themselves and require no further response. To the extent that the allegations contained

1 in paragraph 141 of the Complaint are directed to other defendants, Epson Defendants lack the
2 knowledge or information sufficient to form a belief as to the truth of those allegations and on
3 that basis deny each and every such allegation. To the extent that the allegations contained in
4 paragraph 141 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
5 and every such allegation.

6 142. To the extent that the allegations contained in paragraph 142 of the Complaint
7 purport to characterize agreements between the DOJ and several defendants, such agreements
8 speak for themselves and require no further response. To the extent that the allegations contained
9 in paragraph 142 of the Complaint are directed to other defendants, Epson Defendants lack the
10 knowledge or information sufficient to form a belief as to the truth of those allegations and on
11 that basis deny each and every such allegation. To the extent that the allegations contained in
12 paragraph 142 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
13 and every such allegation.

14 143. To the extent that the allegations contained in paragraph 143 of the Complaint
15 purport to characterize deposition testimony, such testimony speaks for itself as to its contents
16 and requires no further response. To the extent that the allegations contained in paragraph 143 of
17 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
18 information sufficient to form a belief as to the truth of those allegations and on that basis deny
19 each and every such allegation. To the extent that the allegations contained in paragraph 143 of
20 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
21 allegation.

22 144. To the extent that the allegations contained in paragraph 144 of the Complaint
23 purport to characterize documents produced in discovery, such documents speak for themselves
24 as to their contents and requires no further response. To the extent that the allegations contained
25 in paragraph 144 of the Complaint are directed to other defendants, Epson Defendants lack the
26 knowledge or information sufficient to form a belief as to the truth of those allegations and on
27 that basis deny each and every such allegation. To the extent that the allegations contained in
28

1 paragraph 144 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
2 and every such allegation.

3 145. To the extent that the allegations contained in paragraph 145 of the Complaint are
4 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
5 form a belief as to the truth of those allegations and on that basis deny each and every such
6 allegation. To the extent that the allegations contained in paragraph 145 of the Complaint are
7 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

8 146. To the extent that the allegations contained in paragraph 146 of the Complaint are
9 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
10 form a belief as to the truth of those allegations and on that basis deny each and every such
11 allegation. To the extent that the allegations contained in paragraph 146 of the Complaint are
12 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

13 147. To the extent that the allegations contained in paragraph 147 of the Complaint
14 purport to characterize deposition testimony, such testimony speaks for itself as to its contents
15 and requires no further response. To the extent that the allegations contained in paragraph 147 of
16 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
17 information sufficient to form a belief as to the truth of those allegations and on that basis deny
18 each and every such allegation. To the extent that the allegations contained in paragraph 147 of
19 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
20 allegation.

21 148. To the extent that the allegations contained in paragraph 148 of the Complaint
22 purport to characterize an agreement between the DOJ and Sharp, such agreements speak for
23 themselves and require no further response. To the extent that the allegations contained in
24 paragraph 148 of the Complaint are directed to other defendants, Epson Defendants lack the
25 knowledge or information sufficient to form a belief as to the truth of those allegations and on
26 that basis deny each and every such allegation. To the extent that the allegations contained in
27 paragraph 148 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
28 and every such allegation.

1 149. To the extent that the allegations contained in paragraph 149 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 149 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 150. To the extent that the allegations contained in paragraph 150 of the Complaint
7 purport to characterize documents produced in discovery, such documents speak for themselves
8 as to their contents and requires no further response. To the extent that the allegations contained
9 in paragraph 150 of the Complaint are directed to other defendants, Epson Defendants lack the
10 knowledge or information sufficient to form a belief as to the truth of those allegations and on
11 that basis deny each and every such allegation. To the extent that the allegations contained in
12 paragraph 150 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
13 and every such allegation.

14 151. To the extent that the allegations contained in paragraph 151 of the Complaint are
15 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
16 form a belief as to the truth of those allegations and on that basis deny each and every such
17 allegation. To the extent that the allegations contained in paragraph 151 of the Complaint are
18 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

19 152. To the extent that the allegations contained in paragraph 152 of the Complaint are
20 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
21 form a belief as to the truth of those allegations and on that basis deny each and every such
22 allegation. To the extent that the allegations contained in paragraph 152 of the Complaint are
23 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

24 153. To the extent that the allegations contained in paragraph 153 of the Complaint are
25 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
26 form a belief as to the truth of those allegations and on that basis deny each and every such
27 allegation. To the extent that the allegations contained in paragraph 153 of the Complaint are
28 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

1 154. To the extent that the allegations contained in paragraph 154 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 154 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

6 155. To the extent that the allegations contained in paragraph 155 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 155 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 156. To the extent that the allegations contained in paragraph 156 of the Complaint are
12 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
13 form a belief as to the truth of those allegations and on that basis deny each and every such
14 allegation. To the extent that the allegations contained in paragraph 156 of the Complaint are
15 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

16 157. To the extent that the allegations contained in paragraph 157 of the Complaint
17 purport to characterize deposition testimony, such testimony speaks for itself as to its contents
18 and requires no further response. To the extent that the allegations contained in paragraph 157 of
19 the Complaint are directed to other defendants, Epson Defendants lack the knowledge or
20 information sufficient to form a belief as to the truth of those allegations and on that basis deny
21 each and every such allegation. To the extent that the allegations contained in paragraph 157 of
22 the Complaint are directed to Epson Defendants, Epson Defendants deny each and every such
23 allegation.

24 158. To the extent that the allegations contained in paragraph 158 of the Complaint are
25 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
26 form a belief as to the truth of those allegations and on that basis deny each and every such
27 allegation. To the extent that the allegations contained in paragraph 158 of the Complaint are
28 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

1 159. To the extent that the allegations contained in paragraph 159 of the Complaint are
2 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
3 form a belief as to the truth of those allegations and on that basis deny each and every such
4 allegation. To the extent that the allegations contained in paragraph 159 of the Complaint are
5 directed to Epson Defendants, Epson Defendants deny each and every such allegation..

6 160. To the extent that the allegations contained in paragraph 160 of the Complaint are
7 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
8 form a belief as to the truth of those allegations and on that basis deny each and every such
9 allegation. To the extent that the allegations contained in paragraph 160 of the Complaint are
10 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

11 161. To the extent that the allegations contained in paragraph 161 of the Complaint are
12 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
13 form a belief as to the truth of those allegations and on that basis deny each and every such
14 allegation. To the extent that the allegations contained in paragraph 161 of the Complaint are
15 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

16 162. To the extent that the allegations contained in paragraph 162 of the Complaint
17 purport to characterize documents produced in discovery and deposition testimony, such
18 documents and testimony speak for themselves as to their contents and requires no further
19 response. To the extent that the allegations contained in paragraph 162 of the Complaint are
20 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
21 form a belief as to the truth of those allegations and on that basis deny each and every such
22 allegation. To the extent that the allegations contained in paragraph 162 of the Complaint are
23 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

24 163. To the extent that the allegations contained in paragraph 163 of the Complaint
25 purport to characterize statements made plea hearings, such statements speak for themselves as to
26 their contents and require no further response. To the extent that the allegations contained in
27 paragraph 163 of the Complaint are directed to other defendants, Epson Defendants lack the
28 knowledge or information sufficient to form a belief as to the truth of those allegations and on

1 that basis deny each and every such allegation. To the extent that the allegations contained in
2 paragraph 163 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
3 and every such allegation, except admit that EEA maintained offices and operations in California
4 during the relevant period.

5 164. To the extent that the allegations contained in paragraph 164 of the Complaint are
6 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
7 form a belief as to the truth of those allegations and on that basis deny each and every such
8 allegation. To the extent that the allegations contained in paragraph 164 of the Complaint are
9 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

10 165. To the extent that the allegations contained in paragraph 165 of the Complaint are
11 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
12 form a belief as to the truth of those allegations and on that basis deny each and every such
13 allegation. To the extent that the allegations contained in paragraph 165 of the Complaint are
14 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

15 166. To the extent that the allegations contained in paragraph 166 of the Complaint are
16 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
17 form a belief as to the truth of those allegations and on that basis deny each and every such
18 allegation. To the extent that the allegations contained in paragraph 166 of the Complaint are
19 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

20 167. To the extent that the allegations contained in paragraph 167 of the Complaint are
21 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
22 form a belief as to the truth of those allegations and on that basis deny each and every such
23 allegation. To the extent that the allegations contained in paragraph 167 of the Complaint are
24 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

25 168. To the extent that the allegations contained in paragraph 168 of the Complaint are
26 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
27 form a belief as to the truth of those allegations and on that basis deny each and every such
28

1 allegation. To the extent that the allegations contained in paragraph 168 of the Complaint are
2 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

3 169. To the extent that the allegations contained in paragraph 169 of the Complaint are
4 directed to other defendants, Epson Defendants lack the knowledge or information sufficient to
5 form a belief as to the truth of those allegations and on that basis deny each and every such
6 allegation. To the extent that the allegations contained in paragraph 169 of the Complaint are
7 directed to Epson Defendants, Epson Defendants deny each and every such allegation.

8 170. To the extent that the allegations contained in paragraph 170 of the Complaint
9 purport to characterize an agreement between the DOJ and LG Display, such agreement speaks
10 for itself as to its contents and requires no further response. To the extent that the allegations
11 contained in paragraph 170 of the Complaint are directed to other defendants, Epson Defendants
12 lack knowledge or information sufficient to form a belief as to the truth of the allegations and on
13 that basis deny each and every such allegation. To the extent that the allegations contained in
14 paragraph 170 are directed to Epson Defendants, Epson Defendants deny each and every such
15 allegation.

16 171. To the extent that the allegations contained in paragraph 171 of the Complaint are
17 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
18 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
19 To the extent that the allegations contained in paragraph 171 are directed to Epson Defendants,
20 Epson Defendants deny each and every such allegation.

21 172. To the extent that the allegations contained in paragraph 172 of the Complaint are
22 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
23 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
24 To the extent that the allegations contained in paragraph 172 are directed to Epson Defendants,
25 Epson Defendants deny each and every such allegation.

26 173. To the extent that the allegations contained in paragraph 173 of the Complaint are
27 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
28 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

1 To the extent that the allegations contained in paragraph 173 are directed to Epson Defendants,
2 Epson Defendants deny each and every such allegation, except admit that EEA maintained an
3 office in San Jose, California, and that Diane Stabile was an EEA employee who was based in
4 EEA's San Jose office.

5 174. To the extent that the allegations contained in paragraph 174 of the Complaint
6 purport to characterize investigations by governmental authorities and statements by LG Display,
7 such investigations and statements speak for themselves as to their contents and require no further
8 response. To the extent that the allegations contained in paragraph 174 of the Complaint are
9 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
10 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
11 To the extent that the allegations contained in paragraph 174 are directed to Epson Defendants,
12 Epson Defendants deny each and every such allegation.

13 175. To the extent that the allegations contained in paragraph 175 of the Complaint
14 purport to characterize news reports, such reports speak for themselves as to their contents and
15 require no further response. To the extent that the allegations contained in paragraph 175 of the
16 Complaint are directed to other defendants, Epson Defendants lack knowledge or information
17 sufficient to form a belief as to the truth of the allegations and on that basis deny each and every
18 such allegation. To the extent that the allegations contained in paragraph 175 are directed to
19 Epson Defendants, Epson Defendants deny each and every such allegation.

20 176. To the extent that the allegations contained in paragraph 176 of the Complaint
21 purport to characterize agreements entered into between the DOJ and other defendants, such
22 agreements speak for themselves as to their contents and require no further response. To the
23 extent that the allegations contained in paragraph 176 of the Complaint are directed to other
24 defendants, Epson Defendants lack knowledge or information sufficient to form a belief as to the
25 truth of the allegations and on that basis deny each and every such allegation. To the extent that
26 the allegations contained in paragraph 176 are directed to Epson Defendants, Epson Defendants
27 deny each and every such allegation, except admit that EID entered into a guilty plea as set forth
28 in the publicly-filed Plea Agreement in *United States v. Epson Imaging Devices Corporation*,

1 N.D. Cal., No. 09-cr-0854, the contents of which speaks for itself and requires no further
2 response.

3 177. To the extent that the allegations contained in paragraph 177 of the Complaint
4 purport to characterize an agreement entered into between the DOJ and Chi Mei Optoelectronics,
5 such agreement speaks for itself as to its contents and requires no further response. To the extent
6 that the allegations contained in paragraph 177 of the Complaint are directed to other defendants,
7 Epson Defendants lack knowledge or information sufficient to form a belief as to the truth of the
8 allegations and on that basis deny each and every such allegation. To the extent that the
9 allegations contained in paragraph 177 are directed to Epson Defendants, Epson Defendants deny
10 each and every such allegation.

11 178. To the extent that the allegations contained in paragraph 178 of the Complaint
12 purport to characterize an agreement entered into between the DOJ and LG Display, such
13 agreement speaks for itself as to its contents and requires no further response. To the extent that
14 the allegations contained in paragraph 178 of the Complaint are directed to other defendants,
15 Epson Defendants lack knowledge or information sufficient to form a belief as to the truth of the
16 allegations and on that basis deny each and every such allegation. To the extent that the
17 allegations contained in paragraph 178 are directed to Epson Defendants, Epson Defendants deny
18 each and every such allegation.

19 179. To the extent that the allegations contained in paragraph 179 of the Complaint
20 purport to characterize an agreement entered into between the DOJ and C.S. Chung, such
21 agreement speaks for itself as to its contents and requires no further response. To the extent that
22 the allegations contained in paragraph 179 of the Complaint are directed to other defendants,
23 Epson Defendants lack knowledge or information sufficient to form a belief as to the truth of the
24 allegations and on that basis deny each and every such allegation. To the extent that the
25 allegations contained in paragraph 179 are directed to Epson Defendants, Epson Defendants deny
26 each and every such allegation.

27 180. To the extent that the allegations contained in paragraph 180 of the Complaint
28 purport to characterize an agreement entered into between the DOJ and Bock Kwon, such

1 agreement speaks for itself as to its contents and requires no further response. To the extent that
2 the allegations contained in paragraph 180 of the Complaint are directed to other defendants,
3 Epson Defendants lack knowledge or information sufficient to form a belief as to the truth of the
4 allegations and on that basis deny each and every such allegation. To the extent that the
5 allegations contained in paragraph 180 are directed to Epson Defendants, Epson Defendants deny
6 each and every such allegation.

7 181. To the extent that the allegations contained in paragraph 181 of the Complaint
8 purport to characterize a publicly filed indictment returned against Duk Mo Koo, such indictment
9 speaks for itself as to its contents and requires no further response. To the extent that the
10 allegations contained in paragraph 181 of the Complaint are directed to other defendants, Epson
11 Defendants lack knowledge or information sufficient to form a belief as to the truth of the
12 allegations and on that basis deny each and every such allegation. To the extent that the
13 allegations contained in paragraph 181 are directed to Epson Defendants, Epson Defendants deny
14 each and every such allegation.

15 182. To the extent that the allegations contained in paragraph 182 of the Complaint
16 purport to characterize an agreement entered into between the DOJ and Chunghwa, such
17 agreement speaks for itself as to its contents and requires no further response. To the extent that
18 the allegations contained in paragraph 182 of the Complaint are directed to other defendants,
19 Epson Defendants lack knowledge or information sufficient to form a belief as to the truth of the
20 allegations and on that basis deny each and every such allegation. To the extent that the
21 allegations contained in paragraph 182 are directed to Epson Defendants, Epson Defendants deny
22 each and every such allegation.

23 183. To the extent that the allegations contained in paragraph 183 of the Complaint
24 purport to characterize agreements entered into between the DOJ and C.C. Liu and Brian Lee,
25 such agreements speak for themselves as to their contents and require no further response. To the
26 extent that the allegations contained in paragraph 183 of the Complaint are directed to other
27 defendants, Epson Defendants lack knowledge or information sufficient to form a belief as to the
28 truth of the allegations and on that basis deny each and every such allegation. To the extent that

1 the allegations contained in paragraph 183 are directed to Epson Defendants, Epson Defendants
2 deny each and every such allegation.

3 184. To the extent that the allegations contained in paragraph 184 of the Complaint
4 purport to characterize publicly filed indictments returned against Cheng Yuan Lin and Wen Jin
5 Cheng, such indictments speak for themselves as to their contents and require no further response.
6 To the extent that the allegations contained in paragraph 184 of the Complaint are directed to
7 other defendants, Epson Defendants lack knowledge or information sufficient to form a belief as
8 to the truth of the allegations and on that basis deny each and every such allegation. To the extent
9 that the allegations contained in paragraph 184 are directed to Epson Defendants, Epson
10 Defendants deny each and every such allegation.

11 185. To the extent that the allegations contained in paragraph 185 of the Complaint
12 purport to characterize an agreement entered into between the DOJ and Sharp, such agreement
13 speaks for itself as to its contents and requires no further response. To the extent that the
14 allegations contained in paragraph 185 of the Complaint are directed to other defendants, Epson
15 Defendants lack knowledge or information sufficient to form a belief as to the truth of the
16 allegations and on that basis deny each and every such allegation. To the extent that the
17 allegations contained in paragraph 185 are directed to Epson Defendants, Epson Defendants deny
18 each and every such allegation.

19 186. To the extent that the allegations contained in paragraph 186 of the Complaint are
20 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
21 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
22 To the extent that the allegations contained in paragraph 186 are directed to Epson Defendants,
23 Epson Defendants deny each and every such allegation.

24 187. To the extent that the allegations contained in paragraph 187 of the Complaint are
25 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
26 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
27 To the extent that the allegations contained in paragraph 187 are directed to Epson Defendants,
28 Epson Defendants deny each and every such allegation, except admit that EID entered into a

1 guilty plea as set forth in the publicly-filed Plea Agreement in *United States v. Epson Imaging*
2 *Devices Corporation*, N.D. Cal., No. 09-cr-0854, the contents of which speaks for itself and
3 requires no further response.

4 188. To the extent that the allegations contained in paragraph 188 of the Complaint are
5 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
6 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
7 To the extent that the allegations contained in paragraph 188 are directed to Epson Defendants,
8 Epson Defendants deny each and every such allegation.

9 189. To the extent that the allegations contained in paragraph 189 of the Complaint are
10 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
11 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
12 To the extent that the allegations contained in paragraph 189 are directed to Epson Defendants,
13 Epson Defendants deny each and every such allegation.

14 190. To the extent that the allegations contained in paragraph 190 of the Complaint are
15 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
16 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
17 To the extent that the allegations contained in paragraph 190 are directed to Epson Defendants,
18 Epson Defendants deny each and every such allegation.

19 191. To the extent that the allegations contained in paragraph 191 of the Complaint are
20 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
21 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
22 To the extent that the allegations contained in paragraph 191 are directed to Epson Defendants,
23 Epson Defendants deny each and every such allegation.

24 192. To the extent that the allegations contained in paragraph 192 of the Complaint are
25 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
26 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
27 To the extent that the allegations contained in paragraph 192 are directed to Epson Defendants,
28 Epson Defendants deny each and every such allegation.

1 193. To the extent that the allegations contained in paragraph 193 of the Complaint are
2 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
3 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

4 To the extent that the allegations contained in paragraph 193 are directed to Epson Defendants,
5 Epson Defendants deny each and every such allegation.

6 194. To the extent that the allegations contained in paragraph 194 of the Complaint are
7 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
8 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

9 To the extent that the allegations contained in paragraph 194 are directed to Epson Defendants,
10 Epson Defendants deny each and every such allegation.

11 195. To the extent that the allegations contained in paragraph 195 of the Complaint are
12 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
13 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

14 To the extent that the allegations contained in paragraph 195 are directed to Epson Defendants,
15 Epson Defendants deny each and every such allegation.

16 196. To the extent that the allegations contained in paragraph 196 of the Complaint are
17 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
18 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

19 To the extent that the allegations contained in paragraph 196 are directed to Epson Defendants,
20 Epson Defendants deny each and every such allegation.

21 197. To the extent that the allegations contained in paragraph 197 of the Complaint
22 purport to characterize industry magazine reports, such reports speak for themselves as to their
23 contents and require no further response. To the extent that the allegations contained in
24 paragraph 197 of the Complaint are directed to other defendants, Epson Defendants lack
25 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
26 basis deny each and every such allegation. To the extent that the allegations contained in
27 paragraph 197 are directed to Epson Defendants, Epson Defendants deny each and every such
28 allegation.

1 198. To the extent that the allegations contained in paragraph 198 of the Complaint
2 purport to characterize statements by industry analysts, such statements speak for themselves as
3 to their contents and require no further response. To the extent that the allegations contained in
4 paragraph 198 of the Complaint are directed to other defendants, Epson Defendants lack
5 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
6 basis deny each and every such allegation. To the extent that the allegations contained in
7 paragraph 198 are directed to Epson Defendants, Epson Defendants deny each and every such
8 allegation.

9 199. To the extent that the allegations contained in paragraph 199 of the Complaint are
10 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
11 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
12 To the extent that the allegations contained in paragraph 199 are directed to Epson Defendants,
13 Epson Defendants deny each and every such allegation.

14 200. To the extent that the allegations contained in paragraph 200 of the Complaint are
15 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
16 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
17 To the extent that the allegations contained in paragraph 200 are directed to Epson Defendants,
18 Epson Defendants deny each and every such allegation.

19 201. To the extent that the allegations contained in paragraph 201 of the Complaint are
20 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
21 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
22 To the extent that the allegations contained in paragraph 201 are directed to Epson Defendants,
23 Epson Defendants deny each and every such allegation.

24 202. To the extent that the allegations contained in paragraph 202 of the Complaint are
25 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
26 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
27 To the extent that the allegations contained in paragraph 202 are directed to Epson Defendants,
28 Epson Defendants deny each and every such allegation.

1 203. To the extent that the allegations contained in paragraph 203 of the Complaint are
2 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
3 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
4 To the extent that the allegations contained in paragraph 203 are directed to Epson Defendants,
5 Epson Defendants deny each and every such allegation.

6 204. To the extent that the allegation contained in paragraph 204 of the Complaint
7 purport to characterize financial reports by several defendants, such reports speak for themselves
8 as to their contents and require no further response. To the extent that the allegations contained in
9 paragraph 204 of the Complaint are directed to other defendants, Epson Defendants lack
10 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
11 basis deny each and every such allegation. To the extent that the allegations contained in
12 paragraph 204 are directed to Epson Defendants, Epson Defendants deny each and every such
13 allegation.

14 205. To the extent that the allegation contained in paragraph 205 of the Complaint
15 purport to characterize financial reports by several defendants, such reports speak for themselves
16 as to their contents and require no further response. To the extent that the allegations contained in
17 paragraph 205 of the Complaint are directed to other defendants, Epson Defendants lack
18 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
19 basis deny each and every such allegation. To the extent that the allegations contained in
20 paragraph 205 are directed to Epson Defendants, Epson Defendants deny each and every such
21 allegation.

22 206. To the extent that the allegations contained in paragraph 206 of the Complaint are
23 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
24 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
25 To the extent that the allegations contained in paragraph 206 are directed to Epson Defendants,
26 Epson Defendants deny each and every such allegation.

27 207. To the extent that the allegations contained in paragraph 207 of the Complaint are
28 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form

1 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
2 To the extent that the allegations contained in paragraph 207 are directed to Epson Defendants,
3 Epson Defendants deny each and every such allegation.

4 208. To the extent that the allegations contained in paragraph 208 of the Complaint are
5 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
6 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
7 To the extent that the allegations contained in paragraph 208 are directed to Epson Defendants,
8 Epson Defendants deny each and every such allegation.

9 209. To the extent that the allegation contained in paragraph 209 of the Complaint
10 purport to characterize deposition testimony, such speaks for itself as to its contents and requires
11 no further response. To the extent that the allegations contained in paragraph 209 of the
12 Complaint are directed to other defendants, Epson Defendants lack knowledge or information
13 sufficient to form a belief as to the truth of the allegations and on that basis deny each and every
14 such allegation. To the extent that the allegations contained in paragraph 209 are directed to
15 Epson Defendants, Epson Defendants deny each and every such allegation.

16 210. To the extent that the allegation contained in paragraph 210 of the Complaint
17 purport to characterize deposition testimony, such speaks for itself as to its contents and requires
18 no further response. To the extent that the allegations contained in paragraph 210 of the
19 Complaint are directed to other defendants, Epson Defendants lack knowledge or information
20 sufficient to form a belief as to the truth of the allegations and on that basis deny each and every
21 such allegation. To the extent that the allegations contained in paragraph 210 are directed to
22 Epson Defendants, Epson Defendants deny each and every such allegation.

23 211. To the extent that the allegations contained in paragraph 211 of the Complaint are
24 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
25 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
26 To the extent that the allegations contained in paragraph 211 are directed to Epson Defendants,
27 Epson Defendants deny each and every such allegation.

1 212. To the extent that the allegations contained in paragraph 212 of the Complaint are
2 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
3 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
4 To the extent that the allegations contained in paragraph 212 are directed to Epson Defendants,
5 Epson Defendants deny each and every such allegation.

6 213. To the extent that the allegation contained in paragraph 213 of the Complaint
7 purport to characterize documents produced in discovery, such documents speak for themselves
8 as to their contents and require no further response. To the extent that the allegations contained in
9 paragraph 213 of the Complaint are directed to other defendants, Epson Defendants lack
10 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
11 basis deny each and every such allegation. To the extent that the allegations contained in
12 paragraph 213 are directed to Epson Defendants, Epson Defendants deny each and every such
13 allegation.

14 214. To the extent that the allegation contained in paragraph 214 of the Complaint
15 purport to characterize documents produced in discovery, such documents speak for themselves
16 as to their contents and require no further response. To the extent that the allegations contained in
17 paragraph 214 of the Complaint are directed to other defendants, Epson Defendants lack
18 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
19 basis deny each and every such allegation. To the extent that the allegations contained in
20 paragraph 214 are directed to Epson Defendants, Epson Defendants deny each and every such
21 allegation.

22 215. To the extent that the allegations contained in paragraph 215 of the Complaint are
23 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
24 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
25 To the extent that the allegations contained in paragraph 215 are directed to Epson Defendants,
26 Epson Defendants deny each and every such allegation.

27 216. To the extent that the allegation contained in paragraph 216 of the Complaint
28 purport to characterize documents produced in discovery, such documents speak for themselves

1 as to their contents and require no further response. To the extent that the allegations contained in
2 paragraph 216 of the Complaint are directed to other defendants, Epson Defendants lack
3 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
4 basis deny each and every such allegation. To the extent that the allegations contained in
5 paragraph 216 are directed to Epson Defendants, Epson Defendants deny each and every such
6 allegation.

7 217. To the extent that the allegations contained in paragraph 217 of the Complaint are
8 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
9 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
10 To the extent that the allegations contained in paragraph 217 are directed to Epson Defendants,
11 Epson Defendants deny each and every such allegation.

12 218. To the extent that the allegations contained in paragraph 218 of the Complaint
13 purport to characterize agreements between the DOJ and other defendants, such agreements speak
14 for themselves as to their contents and require no further response. To the extent that the
15 allegations contained in paragraph 218 of the Complaint are directed to other defendants, Epson
16 Defendants lack the knowledge or information sufficient to form a belief as to the truth of those
17 allegations and on that basis deny each and every such allegation. To the extent that the
18 allegations contained in paragraph 218 of the Complaint are directed to Epson Defendants, Epson
19 Defendants deny each and every such allegation, except admit that EID entered into a guilty plea
20 as set forth in the publicly-filed Plea Agreement in *United States v. Epson Imaging Devices*
21 *Corporation*, N.D. Cal., No. 09-cr-0854, the contents of which speaks for itself and requires no
22 further response.

23 219. To the extent that the allegations contained in paragraph 219 of the Complaint are
24 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
25 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
26 To the extent that the allegations contained in paragraph 219 are directed to Epson Defendants,
27 Epson Defendants deny each and every such allegation.

1 220. To the extent that the allegations contained in paragraph 220 of the Complaint are
2 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
3 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

4 To the extent that the allegations contained in paragraph 220 are directed to Epson Defendants,
5 Epson Defendants deny each and every such allegation.

6 221. To the extent that the allegations contained in paragraph 221 of the Complaint are
7 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
8 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

9 To the extent that the allegations contained in paragraph 221 are directed to Epson Defendants,
10 Epson Defendants deny each and every such allegation.

11 222. To the extent that the allegations contained in paragraph 222 of the Complaint are
12 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
13 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

14 To the extent that the allegations contained in paragraph 222 are directed to Epson Defendants,
15 Epson Defendants deny each and every such allegation.

16 223. To the extent that the allegations contained in paragraph 223 of the Complaint are
17 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
18 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

19 To the extent that the allegations contained in paragraph 223 are directed to Epson Defendants,
20 Epson Defendants deny each and every such allegation.

21 224. To the extent that the allegations contained in paragraph 224 of the Complaint are
22 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
23 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

24 To the extent that the allegations contained in paragraph 224 are directed to Epson Defendants,
25 Epson Defendants deny each and every such allegation.

26 225. To the extent that the allegations contained in paragraph 225 of the Complaint are
27 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
28 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

1 To the extent that the allegations contained in paragraph 225 are directed to Epson Defendants,
2 Epson Defendants deny each and every such allegation.

3 226. To the extent that the allegations contained in paragraph 226 of the Complaint are
4 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
5 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
6 To the extent that the allegations contained in paragraph 226 are directed to Epson Defendants,
7 Epson Defendants deny each and every such allegation.

8 227. To the extent that the allegation contained in paragraph 227 of the Complaint
9 purport to characterize documents produced in discovery, such documents speak for themselves
10 as to their contents and require no further response. To the extent that the allegations contained in
11 paragraph 227 of the Complaint are directed to other defendants, Epson Defendants lack
12 knowledge or information sufficient to form a belief as to the truth of the allegations and on that
13 basis deny each and every such allegation. To the extent that the allegations contained in
14 paragraph 227 are directed to Epson Defendants, Epson Defendants deny each and every such
15 allegation.

16 228. To the extent that the allegations contained in paragraph 228 of the Complaint are
17 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
18 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
19 To the extent that the allegations contained in paragraph 228 are directed to Epson Defendants,
20 Epson Defendants deny each and every such allegation.

21 229. To the extent that the allegations contained in paragraph 229 of the Complaint are
22 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
23 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
24 To the extent that the allegations contained in paragraph 229 are directed to Epson Defendants,
25 Epson Defendants deny each and every such allegation.

26 230. To the extent that the allegations contained in paragraph 230 of the Complaint are
27 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
28 a belief as to the truth of the allegations and on that basis deny each and every such allegation.

1 To the extent that the allegations contained in paragraph 230 are directed to Epson Defendants,
2 Epson Defendants deny each and every such allegation.

3 231. To the extent that the allegations contained in paragraph 231 of the Complaint are
4 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
5 a belief as to the truth of the allegations and on that basis deny each and every such allegation.
6 To the extent that the allegations contained in paragraph 231 are directed to Epson Defendants,
7 Epson Defendants deny each and every such allegation.

8 232. To the extent that the allegations contained in paragraph 232 of the Complaint
9 purport to characterize statements by the TTLA, such statements speak for themselves as to their
10 contents and require no further response. To the extent that the allegations contained in
11 paragraph 232 of the Complaint are directed to other defendants, Epson Defendants lack
12 knowledge or information sufficient to form a belief as to the truth of those allegations and on
13 that basis deny each and every such allegation. To the extent that the allegations contained in
14 paragraph 232 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
15 and every such allegation.

16 233. To the extent that the allegations contained in paragraph 233 of the Complaint
17 purport to characterize statements by EDIRAK, KODEMIA, and USDC, such statements speak
18 for themselves as to their contents and require no further response. To the extent that the
19 allegations contained in paragraph 233 of the Complaint are directed to other defendants, Epson
20 Defendants lack knowledge or information sufficient to form a belief as to the truth of those
21 allegations and on that basis deny each and every such allegation. To the extent that the
22 allegations contained in paragraph 233 of the Complaint are directed to Epson Defendants, Epson
23 Defendants deny each and every such allegation.

24 234. To the extent that the allegations contained in 234 of the Complaint are directed to
25 other defendants, Epson Defendants lack knowledge or information sufficient to form a belief as
26 to the truth of those allegations and on that basis deny each and every such allegation. To the
27 extent that the allegations contained in paragraph 234 of the Complaint are directed to Epson
28 Defendants, Epson Defendants deny each and every such allegation.

1 235. To the extent that the allegations contained in 235 of the Complaint are directed to
2 other defendants, Epson Defendants lack knowledge or information sufficient to form a belief as
3 to the truth of those allegations and on that basis deny each and every such allegation. To the
4 extent that the allegations contained in paragraph 235 of the Complaint are directed to Epson
5 Defendants, Epson Defendants deny each and every such allegation.

6 236. To the extent that the allegations contained in paragraph 236 of the Complaint are
7 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
8 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
9 To the extent that the allegations contained in paragraph 236 of the Complaint are directed to
10 Epson Defendants, Epson Defendants lack knowledge or information sufficient to form a belief as
11 to the truth of those allegations and on that basis deny each and every such allegation.

12 237. To the extent that the allegations contained in paragraph 237 of the Complaint
13 purport to characterize statements made by a DisplaySearch representative, such statements speak
14 for themselves as to their contents and require no further response. To the extent that the
15 allegations contained in paragraph 237 of the Complaint are directed to other defendants, Epson
16 Defendants lack knowledge or information sufficient to form a belief as to the truth of those
17 allegations and on that basis deny each and every such allegation. To the extent that the
18 allegations contained in paragraph 237 of the Complaint are directed to Epson Defendants, Epson
19 Defendants deny each and every such allegation.

20 238. To the extent that the allegations contained in paragraph 238 of the Complaint
21 purport to characterize statements made by Jun Souk, such statements speak for themselves as to
22 their contents and require no further response. To the extent that the allegations contained in
23 paragraph 238 of the Complaint are directed to other defendants, Epson Defendants lack
24 knowledge or information sufficient to form a belief as to the truth of those allegations and on
25 that basis deny each and every such allegation. To the extent that the allegations contained in
26 paragraph 238 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
27 and every such allegation.

1 239. To the extent that the allegations contained in paragraph 239 of the Complaint
2 purport to characterize statements made at an industry conference, such statements speak for
3 themselves as to their contents and require no further response. To the extent that the allegations
4 contained in paragraph 239 of the Complaint are directed to other defendants, Epson Defendants
5 lack knowledge or information sufficient to form a belief as to the truth of those allegations and
6 on that basis deny each and every such allegation. To the extent that the allegations contained in
7 paragraph 239 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
8 and every such allegation.

9 240. To the extent that the allegations contained in paragraph 240 of the Complaint are
10 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
11 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
12 To the extent that the allegations contained in paragraph 240 of the Complaint are directed to
13 Epson Defendants, Epson Defendants deny each and every such allegation.

14 241. To the extent that the allegations contained in paragraph 241 of the Complaint are
15 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
16 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
17 To the extent that the allegations contained in paragraph 241 of the Complaint are directed to
18 Epson Defendants, Epson Defendants deny each and every such allegation.

19 242. To the extent that the allegations contained in paragraph 242 of the Complaint
20 purport to characterize statements made by Hui Hsiung, such statements speak for themselves as
21 to their contents and require no further response. To the extent that the allegations contained in
22 paragraph 242 of the Complaint are directed to other defendants, Epson Defendants lack
23 knowledge or information sufficient to form a belief as to the truth of those allegations and on
24 that basis deny each and every such allegation. To the extent that the allegations contained in
25 paragraph 242 of the Complaint are directed to Epson Defendants, Epson Defendants deny each
26 and every such allegation.

27 243. To the extent that the allegations contained in paragraph 243 of the Complaint are
28 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form

1 a belief as to the truth of those allegations and on that basis deny each and every such allegation.

2 To the extent that the allegations contained in paragraph 243 of the Complaint are directed to
3 Epson Defendants, Epson Defendants lack knowledge or information sufficient to form a belief as
4 to the truth of those allegations and on that basis deny each and every such allegation.

5 244. To the extent that the allegations contained in paragraph 244 of the Complaint are
6 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
7 a belief as to the truth of those allegations and on that basis deny each and every such allegation.

8 To the extent that the allegations contained in paragraph 244 of the Complaint are directed to
9 Epson Defendants, Epson Defendants deny each and every such allegation.

10 245. To the extent that the allegations contained in paragraph 245 of the Complaint are
11 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
12 a belief as to the truth of those allegations and on that basis deny each and every such allegation.

13 To the extent that the allegations contained in paragraph 245 of the Complaint are directed to
14 Epson Defendants, Epson Defendants deny each and every such allegation.

15 246. To the extent that the allegations contained in paragraph 246 of the Complaint are
16 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
17 a belief as to the truth of those allegations and on that basis deny each and every such allegation.

18 To the extent that the allegations contained in paragraph 246 of the Complaint are directed to
19 Epson Defendants, Epson Defendants deny each and every such allegation.

20 247. To the extent that the allegations contained in paragraph 247 of the Complaint are
21 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
22 a belief as to the truth of those allegations and on that basis deny each and every such allegation.

23 To the extent that the allegations contained in paragraph 247 of the Complaint are directed to
24 Epson Defendants, Epson Defendants deny each and every such allegation.

25 248. To the extent that the allegations contained in paragraph 248 of the Complaint are
26 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
27 a belief as to the truth of those allegations and on that basis deny each and every such allegation.

1 To the extent that the allegations contained in paragraph 248 of the Complaint are directed to
2 Epson Defendants, Epson Defendants deny each and every such allegation.

3 249. To the extent that the allegations contained in paragraph 249 of the Complaint are
4 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
5 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
6 To the extent that the allegations contained in paragraph 249 of the Complaint are directed to
7 Epson Defendants, Epson Defendants deny each and every such allegation.

8 250. To the extent that the allegations contained in paragraph 250 of the Complaint
9 purport to characterizing documents filed with the International Trade Commission, such
10 documents speak for themselves as to their contents and require no further response. To the
11 extent that the allegations contained in paragraph 250 of the Complaint are directed to other
12 defendants, Epson Defendants lack knowledge or information sufficient to form a belief as to the
13 truth of those allegations and on that basis deny each and every such allegation. To the extent
14 that the allegations contained in paragraph 250 of the Complaint are directed to Epson
15 Defendants, Epson Defendants deny each and every such allegation.

16 251. To the extent that the allegations contained in paragraph 251 of the Complaint
17 purport to characterize agreements entered into between several defendants and the DOJ, such
18 agreement speak for themselves as to their contents and require no further response. To the
19 extent that the allegations contained in paragraph 251 of the Complaint are directed to other
20 defendants, Epson Defendants lack knowledge or information sufficient to form a belief as to the
21 truth of those allegation and on that basis deny each and every such allegation. To the extent that
22 the allegations contained in paragraph 251 of the Complaint are directed to Epson Defendants,
23 Epson Defendants deny each and every such allegation, except admit that EID entered a guilty
24 plea as set forth in the publicly-filed Plea Agreement in *United States v. Epson Imaging Devices*
25 *Corporation*, N.D. Cal., No. 09-cr-0854, the contents of which speaks for itself and requires no
26 further response.

27 252. With respect to paragraph 252 of the Complaint, Epson Defendants are not
28 required to respond because it does not contain any allegation of fact, but rather consists of

1 arguments and conclusions of law. To the extent that the allegations contained in paragraph 252
2 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
3 information sufficient to form a belief as to the truth of those allegations and on that basis deny
4 each and every such allegation. To the extent that the allegations contained in paragraph 252 of
5 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
6 allegation.

7 253. With respect to paragraph 253 of the Complaint, Epson Defendants are not
8 required to respond because it does not contain any allegation of fact, but rather consists of
9 arguments and conclusions of law. To the extent that the allegations contained in paragraph 253
10 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
11 information sufficient to form a belief as to the truth of those allegations and on that basis deny
12 each and every such allegation. To the extent that the allegations contained in paragraph 253 of
13 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
14 allegation.

15 254. To the extent that the allegations contained in paragraph 254 of the Complaint are
16 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
17 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
18 To the extent that the allegations contained in paragraph 254 of the Complaint are direct to Epson
19 Defendants, Epson Defendants deny each and every such allegation.

20 255. Epson Defendants lack knowledge or information sufficient to form a belief as to
21 the truth of the allegations contained in paragraph 255 and on that basis deny each and every such
22 allegation.

23 256. To the extent that the allegations contained in paragraph 256 of the Complaint are
24 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
25 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
26 To the extent that the allegations contained in paragraph 256 of the Complaint are direct to Epson
27 Defendants, Epson Defendants deny each and every such allegation.

1 257. To the extent that the allegations contained in paragraph 257 of the Complaint are
2 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
3 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
4 To the extent that the allegations contained in paragraph 257 of the Complaint are direct to Epson
5 Defendants, Epson Defendants deny each and every such allegation.

6 258. To the extent that the allegations contained in paragraph 258 of the Complaint are
7 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
8 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
9 To the extent that the allegations contained in paragraph 258 of the Complaint are direct to Epson
10 Defendants, Epson Defendants deny each and every such allegation.

11 259. With respect to paragraph 259 of the Complaint, Epson Defendants are not
12 required to respond because it does not contain any allegation of fact, but rather consists of
13 arguments and conclusions of law. To the extent that the allegations contained in paragraph 259
14 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
15 information sufficient to form a belief as to the truth of those allegations and on that basis deny
16 each and every such allegation. To the extent that the allegations contained in paragraph 259 of
17 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
18 allegation.

19 260. With respect to paragraph 260 of the Complaint, Epson Defendants are not
20 required to respond because it does not contain any allegation of fact, but rather consists of
21 arguments and conclusions of law. To the extent that the allegations contained in paragraph 260
22 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
23 information sufficient to form a belief as to the truth of those allegations and on that basis deny
24 each and every such allegation. To the extent that the allegations contained in paragraph 260 of
25 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
26 allegation.

27 261. To the extent that the allegations contained in paragraph 261 of the Complaint are
28 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form

1 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
2 To the extent that the allegations contained in paragraph 261 of the Complaint are direct to Epson
3 Defendants, Epson Defendants deny each and every such allegation.

4 262. To the extent that the allegations contained in paragraph 262 of the Complaint
5 purport to characterize deposition testimony and documents produced in discovery, such
6 testimony and documents speak for themselves as to their contents and require no further
7 response. To the extent that the allegations contained in paragraph 262 of the Complaint are
8 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
9 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
10 To the extent that the allegations contained in paragraph 262 of the Complaint are direct to Epson
11 Defendants, Epson Defendants deny each and every such allegation.

12 263. To the extent that the allegations contained in paragraph 263 of the Complaint
13 purport to characterize documents produced in discovery, such documents speak for themselves
14 as to their contents and require no further response. To the extent that the allegations contained in
15 paragraph 263 of the Complaint are directed to other defendants, Epson Defendants lack
16 knowledge or information sufficient to form a belief as to the truth of those allegations and on
17 that basis deny each and every such allegation. To the extent that the allegations contained in
18 paragraph 263 of the Complaint are direct to Epson Defendants, Epson Defendants deny each and
19 every such allegation.

20 264. To the extent that the allegations contained in paragraph 264 of the Complaint
21 purport to characterize deposition testimony and documents produced in discovery, such
22 testimony and documents speak for themselves as to their contents and require no further
23 response. To the extent that the allegations contained in paragraph 264 of the Complaint are
24 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
25 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
26 To the extent that the allegations contained in paragraph 264 of the Complaint are direct to Epson
27 Defendants, Epson Defendants deny each and every such allegation.

1 265. To the extent that the allegations contained in paragraph 265 of the Complaint
2 purport to characterize deposition testimony and documents produced in discovery, such
3 testimony and documents speak for themselves as to their contents and require no further
4 response. To the extent that the allegations contained in paragraph 265 of the Complaint are
5 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
6 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
7 To the extent that the allegations contained in paragraph 265 of the Complaint are direct to Epson
8 Defendants, Epson Defendants deny each and every such allegation.

9 266. To the extent that the allegations contained in paragraph 266 of the Complaint
10 purport to characterize deposition testimony and documents produced in discovery, such
11 testimony and documents speak for themselves as to their contents and require no further
12 response. To the extent that the allegations contained in paragraph 266 of the Complaint are
13 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
14 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
15 To the extent that the allegations contained in paragraph 266 of the Complaint are direct to Epson
16 Defendants, Epson Defendants deny each and every such allegation.

17 267. To the extent that the allegations contained in paragraph 167 of the Complaint are
18 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
19 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
20 To the extent that the allegations contained in paragraph 167 of the Complaint are direct to Epson
21 Defendants, Epson Defendants deny each and every such allegation.

22 268. To the extent that the allegations contained in paragraph 268 of the Complaint
23 purport to characterize statements by Omid Milani and others, such statements speak for
24 themselves as to their contents and require no further response. To the extent that the allegations
25 contained in paragraph 268 of the Complaint are directed to other defendants, Epson Defendants
26 lack knowledge or information sufficient to form a belief as to the truth of those allegations and
27 on that basis deny each and every such allegation. To the extent that the allegations contained in
28

1 paragraph 268 of the Complaint are direct to Epson Defendants, Epson Defendants deny each and
2 every such allegation.

3 269. To the extent that the allegations contained in paragraph 269 of the Complaint
4 purport to characterize statements by Joel Pollack, such statements speak for themselves as to
5 their contents and require no further response. To the extent that the allegations contained in
6 paragraph 269 of the Complaint are directed to other defendants, Epson Defendants lack
7 knowledge or information sufficient to form a belief as to the truth of those allegations and on
8 that basis deny each and every such allegation. To the extent that the allegations contained in
9 paragraph 269 of the Complaint are direct to Epson Defendants, Epson Defendants deny each and
10 every such allegation.

11 270. To the extent that the allegations contained in paragraph 270 of the Complaint
12 purport to characterize statements by Yoon-Woo Lee, such statements speak for themselves as to
13 their contents and require no further response. To the extent that the allegations contained in
14 paragraph 270 of the Complaint are directed to other defendants, Epson Defendants lack
15 knowledge or information sufficient to form a belief as to the truth of those allegations and on
16 that basis deny each and every such allegation. To the extent that the allegations contained in
17 paragraph 270 of the Complaint are direct to Epson Defendants, Epson Defendants deny each and
18 every such allegation.

19 271. To the extent that the allegations contained in paragraph 271 of the Complaint
20 purport to characterize statements by Bruce Berkoff and others, such statements speak for
21 themselves as to their contents and require no further response. To the extent that the allegations
22 contained in paragraph 271 of the Complaint are directed to other defendants, Epson Defendants
23 lack knowledge or information sufficient to form a belief as to the truth of those allegations and
24 on that basis deny each and every such allegation. To the extent that the allegations contained in
25 paragraph 271 of the Complaint are direct to Epson Defendants, Epson Defendants deny each and
26 every such allegation.

27 272. To the extent that the allegations contained in paragraph 272 of the Complaint
28 purport to characterize statements by Hsu Jen-Ting and others, such statements speak for

1 themselves as to their contents and require no further response. To the extent that the allegations
2 contained in paragraph 272 of the Complaint are directed to other defendants, Epson Defendants
3 lack knowledge or information sufficient to form a belief as to the truth of those allegations and
4 on that basis deny each and every such allegation. To the extent that the allegations contained in
5 paragraph 272 of the Complaint are direct to Epson Defendants, Epson Defendants deny each and
6 every such allegation.

7 273. To the extent that the allegations contained in paragraph 273 of the Complaint are
8 directed to other defendants, Epson Defendants lack knowledge or information sufficient to form
9 a belief as to the truth of those allegations and on that basis deny each and every such allegation.
10 To the extent that the allegations contained in paragraph 273 of the Complaint are direct to Epson
11 Defendants, Epson Defendants deny each and every such allegation.

12 274. With respect to paragraph 274 of the Complaint, Epson Defendants are not
13 required to respond because it does not contain any allegation of fact, but rather consists of
14 arguments and conclusions of law. To the extent that the allegations contained in paragraph 274
15 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
16 information sufficient to form a belief as to the truth of those allegations and on that basis deny
17 each and every such allegation. To the extent that the allegations contained in paragraph 274 of
18 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
19 allegation.

20 275. With respect to paragraph 275 of the Complaint, Epson Defendants are not
21 required to respond because it does not contain any allegation of fact, but rather consists of
22 arguments and conclusions of law. To the extent that the allegations contained in paragraph 275
23 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
24 information sufficient to form a belief as to the truth of those allegations and on that basis deny
25 each and every such allegation. To the extent that the allegations contained in paragraph 275 of
26 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
27 allegation.

1 276. With respect to paragraph 276 of the Complaint, Epson Defendants are not
2 required to respond because it does not contain any allegation of fact, but rather consists of
3 arguments and conclusions of law. To the extent that the allegations contained in paragraph 276
4 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
5 information sufficient to form a belief as to the truth of those allegations and on that basis deny
6 each and every such allegation. To the extent that the allegations contained in paragraph 276 of
7 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
8 allegation.

9 277. With respect to paragraph 277 of the Complaint, Epson Defendants are not
10 required to respond because it does not contain any allegation of fact, but rather consists of
11 arguments and conclusions of law. To the extent that the allegations contained in paragraph 277
12 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
13 information sufficient to form a belief as to the truth of those allegations and on that basis deny
14 each and every such allegation. To the extent that the allegations contained in paragraph 277 of
15 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
16 allegation.

17 278. With respect to paragraph 278 of the Complaint, Epson Defendants are not
18 required to respond because it does not contain any allegation of fact, but rather consists of
19 arguments and conclusions of law. To the extent that the allegations contained in paragraph 278
20 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
21 information sufficient to form a belief as to the truth of those allegations and on that basis deny
22 each and every such allegation. To the extent that the allegations contained in paragraph 278 of
23 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
24 allegation.

25 279. With respect to paragraph 279 of the Complaint, Epson Defendants are not
26 required to respond because it does not contain any allegation of fact, but rather consists of
27 arguments and conclusions of law. To the extent that the allegations contained in paragraph 279
28 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or

1 information sufficient to form a belief as to the truth of those allegations and on that basis deny
2 each and every such allegation. To the extent that the allegations contained in paragraph 279 of
3 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
4 allegation.

5 280. Answering the allegations contained in paragraph 280 of the Complaint, Epson
6 Defendants restate and reincorporate as if fully set forth herein each of the several responses set
7 forth above to each and every allegation contained in paragraphs 1 through 279, inclusive, of the
8 Complaint.

9 281. With respect to paragraph 281 of the Complaint, Epson Defendants are not
10 required to respond because it does not contain any allegation of fact, but rather consists of
11 arguments and conclusions of law. To the extent that the allegations contained in paragraph 281
12 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
13 information sufficient to form a belief as to the truth of those allegations and on that basis deny
14 each and every such allegation. To the extent that the allegations contained in paragraph 281 of
15 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
16 allegation.

17 282. With respect to paragraph 282 of the Complaint, Epson Defendants are not
18 required to respond because it does not contain any allegation of fact, but rather consists of
19 arguments and conclusions of law. To the extent that the allegations contained in paragraph 282
20 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
21 information sufficient to form a belief as to the truth of those allegations and on that basis deny
22 each and every such allegation. To the extent that the allegations contained in paragraph 282 of
23 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
24 allegation.

25 283. With respect to paragraph 283 of the Complaint, Epson Defendants are not
26 required to respond because it does not contain any allegation of fact, but rather consists of
27 arguments and conclusions of law. To the extent that the allegations contained in paragraph 283
28 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or

1 information sufficient to form a belief as to the truth of those allegations and on that basis deny
2 each and every such allegation. To the extent that the allegations contained in paragraph 283 of
3 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
4 allegation.

5 284. With respect to paragraph 284 of the Complaint, Epson Defendants are not
6 required to respond because it does not contain any allegation of fact, but rather consists of
7 arguments and conclusions of law. To the extent that the allegations contained in paragraph 284
8 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
9 information sufficient to form a belief as to the truth of those allegations and on that basis deny
10 each and every such allegation. To the extent that the allegations contained in paragraph 284 of
11 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
12 allegation.

13 285. With respect to paragraph 285 of the Complaint, Epson Defendants are not
14 required to respond because it does not contain any allegation of fact, but rather consists of
15 arguments and conclusions of law. To the extent that the allegations contained in paragraph 285
16 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
17 information sufficient to form a belief as to the truth of those allegations and on that basis deny
18 each and every such allegation. To the extent that the allegations contained in paragraph 285 of
19 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
20 allegation.

21 286. With respect to paragraph 286 of the Complaint, Epson Defendants are not
22 required to respond because it does not contain any allegation of fact, but rather consists of
23 arguments and conclusions of law. To the extent that the allegations contained in paragraph 286
24 of the Complaint are directed to other defendants, Epson Defendants lack knowledge or
25 information sufficient to form a belief as to the truth of those allegations and on that basis deny
26 each and every such allegation. To the extent that the allegations contained in paragraph 286 of
27 the Complaint are direct to Epson Defendants, Epson Defendants deny each and every such
28 allegation.

1 287. Answering the allegations contained in paragraph 287 of the Complaint, Epson
2 Defendants restate and reincorporate as if fully set forth herein each of the several responses set
3 forth above to each and every allegation contained in paragraphs 1 through 286, inclusive, of the
4 Complaint.

5 288. To the extent that the allegations of paragraph 288 refer to claims dismissed by the
6 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
7 no longer form a part of the operative complaint. To the extent that a response is required and the
8 allegations are directed to other defendants, Epson Defendants lack knowledge or information
9 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
10 every such allegation. To the extent that a response is required and the allegations are directed to
11 Epson Defendants, Epson Defendants deny each and every such allegation.

12 289. To the extent that the allegations of paragraph 289 refer to claims dismissed by the
13 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
14 no longer form a part of the operative complaint. To the extent that a response is required and the
15 allegations are directed to other defendants, Epson Defendants lack knowledge or information
16 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
17 every such allegation. To the extent that a response is required and the allegations are directed to
18 Epson Defendants, Epson Defendants deny each and every such allegation.

19 290. To the extent that the allegations of paragraph 290 refer to claims dismissed by the
20 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
21 no longer form a part of the operative complaint. To the extent that a response is required and the
22 allegations are directed to other defendants, Epson Defendants lack knowledge or information
23 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
24 every such allegation. To the extent that a response is required and the allegations are directed to
25 Epson Defendants, Epson Defendants deny each and every such allegation.

26 291. To the extent that the allegations of paragraph 291 refer to claims dismissed by the
27 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
28 no longer form a part of the operative complaint. To the extent that a response is required and the

1 allegations are directed to other defendants, Epson Defendants lack knowledge or information
2 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
3 every such allegation. To the extent that a response is required and the allegations are directed to
4 Epson Defendants, Epson Defendants deny each and every such allegation.

5 292. To the extent that the allegations of paragraph 292 refer to claims dismissed by the
6 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
7 no longer form a part of the operative complaint. To the extent that a response is required and the
8 allegations are directed to other defendants, Epson Defendants lack knowledge or information
9 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
10 every such allegation. To the extent that a response is required and the allegations are directed to
11 Epson Defendants, Epson Defendants deny each and every such allegation.

12 293. To the extent that the allegations of paragraph 293 refer to claims dismissed by the
13 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
14 no longer form a part of the operative complaint. To the extent that a response is required and the
15 allegations are directed to other defendants, Epson Defendants lack knowledge or information
16 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
17 every such allegation. To the extent that a response is required and the allegations are directed to
18 Epson Defendants, Epson Defendants deny each and every such allegation.

19 294. To the extent that the allegations of paragraph 294 refer to claims dismissed by the
20 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
21 no longer form a part of the operative complaint. To the extent that a response is required and the
22 allegations are directed to other defendants, Epson Defendants lack knowledge or information
23 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
24 every such allegation. To the extent that a response is required and the allegations are directed to
25 Epson Defendants, Epson Defendants deny each and every such allegation.

26 295. To the extent that the allegations of paragraph 295 refer to claims dismissed by the
27 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
28 no longer form a part of the operative complaint. To the extent that a response is required and the

1 allegations are directed to other defendants, Epson Defendants lack knowledge or information
2 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
3 every such allegation. To the extent that a response is required and the allegations are directed to
4 Epson Defendants, Epson Defendants deny each and every such allegation.

5 296. To the extent that the allegations of paragraph 296 refer to claims dismissed by the
6 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
7 no longer form a part of the operative complaint. To the extent that a response is required and the
8 allegations are directed to other defendants, Epson Defendants lack knowledge or information
9 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
10 every such allegation. To the extent that a response is required and the allegations are directed to
11 Epson Defendants, Epson Defendants deny each and every such allegation.

12 297. To the extent that the allegations of paragraph 297 refer to claims dismissed by the
13 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
14 no longer form a part of the operative complaint. To the extent that a response is required and the
15 allegations are directed to other defendants, Epson Defendants lack knowledge or information
16 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
17 every such allegation. To the extent that a response is required and the allegations are directed to
18 Epson Defendants, Epson Defendants deny each and every such allegation.

19 298. To the extent that the allegations of paragraph 298 refer to claims dismissed by the
20 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
21 no longer form a part of the operative complaint. To the extent that a response is required and the
22 allegations are directed to other defendants, Epson Defendants lack knowledge or information
23 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
24 every such allegation. To the extent that a response is required and the allegations are directed to
25 Epson Defendants, Epson Defendants deny each and every such allegation.

26 299. To the extent that the allegations of paragraph 299 refer to claims dismissed by the
27 Court's Feb. 6, 2012 Order, Epson Defendants aver that no response is necessary as these claims
28 no longer form a part of the operative complaint. To the extent that a response is required and the

1 allegations are directed to other defendants, Epson Defendants lack knowledge or information
2 sufficient to form a belief as to the truth of those allegations and on that basis deny each and
3 every such allegation. To the extent that a response is required and the allegations are directed to
4 Epson Defendants, Epson Defendants deny each and every such allegation.

5 300. Epson Defendants deny each and every allegation contained in the *ad damnum*
6 clause of the Complaint and deny each and every allegation contained in the Complaint to the
7 extent that a response has not been provided herein.

8 **ADDITIONAL DEFENSES**

9 1. As additional defenses to the Complaint, Epson Defendants state, without
10 assuming any burden of pleading or proof that would otherwise rest with the plaintiff, as follows:

11 **FIRST ADDITIONAL DEFENSE**

12 (Lack of Subject Matter Jurisdiction)

13 2. The conduct alleged to provide a basis for the plaintiff's claims did not have a
14 direct, substantial, and reasonably foreseeable effect on trade or commerce with the United States.
15 The Court therefore lacks subject matter jurisdiction over plaintiff's claims.

16 **SECOND ADDITIONAL DEFENSE**

17 (Failure to State a Claim)

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

19 **THIRD ADDITIONAL DEFENSE**

20 (Failure to Plead Fraud Particularly; Fed.R.Civ.P. 9(b))

21 4. Plaintiff has failed to plead fraudulent concealment with the particularity required
22 by Rule 9(b) of the Federal Rules of Civil Procedure.

23 **FOURTH ADDITIONAL DEFENSE**

24 (Forum Non Conveniens)

25 5. The complaint should be dismissed on the grounds of forum non conveniens.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FIFTH ADDITIONAL DEFENSE

(Improper Forum/Arbitration)

6. Plaintiff’s claims are barred, in whole or in part, because plaintiff is required to arbitrate its claims against Epson Defendants.

SIXTH ADDITIONAL DEFENSE

(Lack of Standing)

7. Plaintiff’s claims are barred, in whole or in part, because plaintiff lacks standing to bring or maintain the claims set forth in the Complaint.

SEVENTH ADDITIONAL DEFENSE

(Lack of Standing – Indirect Purchasers)

8. Plaintiff’s claims are barred, in whole or in part, to the extent that it did not purchase LCD panels or LCD products directly from defendants, because it is an indirect purchaser and is barred from maintaining an action under 15 U.S.C. § 1 for alleged injuries in that capacity.

EIGHTH ADDITIONAL DEFENSE

(Lack of Antitrust Injury)

9. Plaintiff’s claims are barred, in whole or in part, because plaintiff has suffered no antitrust injury.

NINTH ADDITIONAL DEFENSE

(Statute of Limitations)

10. Plaintiff’s claims are barred, in whole or in part, by applicable statutes of limitations, including but not limited to Section 4B of the Clayton Act (15 U.S.C. § 15b) and the applicable statute of limitations under the state laws provided.

TENTH ADDITIONAL DEFENSE

(Waiver)

11. Plaintiff’s claims are barred, in whole or in part, by the doctrine of waiver.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ELEVENTH ADDITIONAL DEFENSE

(Estoppel)

12. Plaintiff's claims are barred, in whole or in part, by the doctrine of estoppel.

TWELFTH ADDITIONAL DEFENSE

(Laches)

13. Plaintiff's claims are barred, in whole or in part, by the doctrine of laches.

THIRTEENTH ADDITIONAL DEFENSE

(No Act by Epson Defendants)

14. Plaintiff's claims are barred, in whole or in part, because plaintiff has not been injured in its business or property by reason of any action of Epson Defendants.

FOURTEENTH ADDITIONAL DEFENSE

(Intervening Conduct)

15. Plaintiff's claims are barred, in whole or in part, because any alleged injuries and damages were not legally or proximately caused by any acts or omissions of Epson Defendants and/or were caused, if at all, solely and proximately by the conduct of third parties including, without limitation, the prior, intervening, or superseding conduct of such third parties.

FIFTEENTH ADDITIONAL DEFENSE

(Ultra Vires)

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

SIXTEENTH ADDITIONAL DEFENSE

(Speculative Damages)

17. Plaintiff's claims are barred, in whole or in part, because the alleged damages, if any, are speculative and because of the impossibility of the ascertainment and allocation of such alleged damages.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SEVENTEENTH ADDITIONAL DEFENSE

(Failure to Mitigate Damages)

18. Plaintiff’s claims are barred from recovery of any damages because of and to the extent of its failure to mitigate damages.

EIGHTEENTH ADDITIONAL DEFENSE

(Unilateral Action)

19. Plaintiff’s claims are barred, in whole or in part, because any actions or practices by Epson Defendants that are the subject of the Complaint were undertaken unilaterally for legitimate business reasons and in pursuit of Epson Defendants’ independent interests and those of its customers, and were not the product of any contract, combination, or conspiracy between Epson Defendants and any other person or entity.

NINETEENTH ADDITIONAL DEFENSE

(Rule of Reason)

20. Plaintiff’s claims are barred, in whole or in part, because any acts or practices by Epson Defendants that are the subject of the Complaint were adopted in furtherance of legitimate business interests of Epson Defendants and of its customers and do not unreasonably restrain competition.

TWENTIETH ADDITIONAL DEFENSE

(Competition)

21. Plaintiff’s claims are barred, in whole or in part, because any acts or practices by Epson Defendants that are the subject of the Complaint were cost justified or otherwise economically justified and resulted from a good faith effort to meet competition or market conditions.

TWENTY-FIRST ADDITIONAL DEFENSE

(Privileged Conduct)

22. Plaintiff’s claims are barred, in whole or in part, as premised upon privileged conduct or actions by Epson Defendants.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TWENTY-SECOND ADDITIONAL DEFENSE

(Pass Through)

23. Plaintiff’s claims are barred, in whole or in part, because it fails to meet its burden of proving that it was damaged in fact by the conduct of which complaint is here made, including the burden of proving that any so-called overcharge was not absorbed in whole or in part by direct purchasers or by other third parties, and was passed through to the plaintiff.

TWENTY-THIRD ADDITIONAL DEFENSE

(Pass On)

24. Plaintiff’s claims are barred, in whole or in part, because it fails to meet its burden of proving that it was damaged in fact by the conduct of which complaint is here made, including the burden of proving that any so-called overcharge was not passed on by the plaintiff to a third party.

TWENTY-FOURTH ADDITIONAL DEFENSE

(Due Process)

25. Plaintiff’s claims are barred, in whole or in part, to the extent it seeks an improper multiple punitive award for a single wrong because such an award would violate Epson Defendants’ rights guaranteed by the Due Process clause of the Fifth Amendment of the United States Constitution.

TWENTY-FIFTH ADDITIONAL DEFENSE

(Due Process)

26. Plaintiff’s claims are barred, in whole or in part, to the extent it seeks an improper multiple punitive award for a single wrong because such an award would violate Epson Defendants’ rights guaranteed by the Due Process clause of the Fourteenth Amendment of the United States Constitution.

TWENTY-SIXTH ADDITIONAL DEFENSE

(Equal Protection)

27. Plaintiff’s claims are barred, in whole or in part, to the extent it seeks an improper multiple punitive award for a single wrong because such an award would violate Epson

1 Defendants' rights guaranteed by the Equal Protection provision clause of the Fourteenth
2 Amendment of the United States Constitution.

3 **TWENTY-SEVENTH ADDITIONAL DEFENSE**

4 (Double Jeopardy)

5 28. Plaintiff's claims are barred, in whole or in part, to the extent it seeks an improper
6 multiple punitive award for a single wrong because such an award would violate Epson
7 Defendants' rights guaranteed by the Double Jeopardy Clause of the Fifth Amendment of the
8 United States Constitution.

9 **TWENTY-EIGHTH ADDITIONAL DEFENSE**

10 (Excessive Fines)

11 29. Plaintiff's claims are barred, in whole or in part, to the extent they seek an
12 improper multiple punitive award for a single wrong because such an award would violate Epson
13 Defendants' rights guaranteed by the Excessive Fines provision of the Eighth Amendment of the
14 United States Constitution.

15 **TWENTY-NINTH ADDITIONAL DEFENSE**

16 (Unconstitutional Multiplicity)

17 30. To the extent any recovery by the plaintiff would be duplicative of recovery by
18 other plaintiff and other lawsuits, subjecting Epson Defendants to the possibility of multiple
19 liability, such recovery is barred by the Fifth and Eighth Amendments to the United States
20 Constitution.

21 **THIRTIETH ADDITIONAL DEFENSE**

22 (Bar on Duplicative Recovery)

23 31. To the extent any recovery by the plaintiff would be duplicative of recovery by
24 other plaintiff that are predecessors or successors to plaintiff in the chain of distribution,
25 subjecting Epson Defendants to the possibility of multiple liability, such recovery is barred.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THIRTY-FIRST ADDITIONAL DEFENSE

(Release)

32. Plaintiff's claims are barred, in whole or in part, to the extent of any release or compromise of such claims between the parties.

THIRTY-SECOND ADDITIONAL DEFENSE

(Accord and Satisfaction)

33. Plaintiff's claims are barred, in whole or in part, by the doctrine of accord and satisfaction.

THIRTY-THIRD ADDITIONAL DEFENSE

(Failure of Consideration)

34. Plaintiff's claims are barred, in whole or in part, as a result of a failure of consideration.

THIRTY-FOURTH ADDITIONAL DEFENSE

(Illegality of Contract)

35. Plaintiff's claims are barred, in whole or in part, by the doctrine of illegality of contract.

THIRTY-FIFTH ADDITIONAL DEFENSE

(Statute of Frauds)

36. Plaintiff's claims are barred, in whole or in part, by the statute of frauds.

THIRTY-SIXTH ADDITIONAL DEFENSE

(Fraud)

37. Plaintiff's claims are barred, in whole or in part, to the extent plaintiff induced Epson Defendants into entering contracts based on fraud.

THIRTY-SEVENTH ADDITIONAL DEFENSE

(Mistake of Fact)

38. Plaintiff's claims are barred, in whole or in part, by reason of the doctrine of mistake of fact.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THIRTY-EIGHTH ADDITIONAL DEFENSE

(Duress)

39. Plaintiff's claims are barred, in whole or in part, by reason of duress.

THIRTY-NINTH ADDITIONAL DEFENSE

(Setoff)

40. To the extent that the plaintiff has outstanding obligations to Epson Defendants, their claims are barred or reduced.

FORTIETH ADDITIONAL DEFENSE

(Incorporation of Defenses of Others)

41. Epson Defendants adopt by reference any applicable defense pleaded by any other defendant not otherwise expressly set forth herein.

FORTY-FIRST ADDITIONAL DEFENSE

(Reservation of Other Defenses)

42. Epson Defendants reserve the right to assert other defenses as this action proceeds, up to and including the time of trial.

///
///
///
///
///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREFORE, Epson Defendants pray any claims set forth in the Complaint be dismissed with prejudice, that Epson Defendants be awarded their costs in defending this action, and that Epson Defendants be granted such other relief as the court deems just in the premises.

Dated: March 5, 2012

MELVIN R. GOLDMAN
STEPHEN P. FRECCERO
DEREK F. FORAN
MORRISON & FOERSTER LLP

By: /s/ Stephen P. Freccero
STEPHEN P. FRECCERO

Attorneys for Defendant
Epson Imaging Devices Corporation
and Epson Electronics America, Inc.

sf-3112496