

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:12-cv-20271-RNS-TEB

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

JURY TRIAL DEMANDED

Consolidated Cases

Case No. 1:10-cv-23580-RNS

Case No. 1:12-cv-20271-RNS

APPLE INC.,

Counterclaim Plaintiff

v.

MOTOROLA MOBILITY, INC., HTC
CORPORATION, HTC AMERICA, INC.,
ONE & COMPANY DESIGN, INC., and
HTC AMERICA INNOVATION INC.,

Counterclaim Defendants.

**ANSWER TO DEFENDANT AND COUNTERCLAIM
PLAINTIFF APPLE INC.'S COUNTERCLAIMS TO FIRST AMENDED COMPLAINT**

Counterclaim Defendants HTC Corporation, HTC America, Inc., One & Company Design, Inc., and HTC America Innovation Inc. (collectively “HTC Defendants”), for their Answer to the Counterclaims of Defendant and Counterclaim Plaintiff Apple Inc. (“Counterclaims”) (Docket No. 95) hereby responds as follows:

ANSWER TO APPLE'S COUNTERCLAIMS

GENERAL DENIAL

Unless expressly admitted below, HTC Defendants deny each and every allegation Apple has set forth in its Counterclaims.

PARTIES

161. Admitted.

162. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 regarding Counterclaim Defendant Motorola Mobility, Inc. ("Motorola") and therefor they are denied.

163. HTC Defendants admit that HTC Corporation is a corporation organized under the laws of Taiwan and having a principal place of business at 23 Xinghua Road, Taoyuan 330, Taiwan, Republic of China. HTC Defendants admit that HTC Corporation is engaged in the design, research and development, manufacture, and sales of mobile communication devices. HTC Defendants admit that HTC Corporation has subsidiary corporations. HTC Defendants deny the remainder of the allegations in Paragraph 163.

164. Admitted.

165. Admitted.

166. HTC Defendants admit that HTC America Innovation, Inc. is a corporation organized under the laws of the state of Washington and having a principal place of business at SE 13920 Eastgate Way, Suite 400 Bellevue, WA 98005. HTC Defendants admit that HTC America Innovation, Inc. is a wholly-owned subsidiary of HTC America Holding, Inc. HTC Defendants admit that HTC America Innovation, Inc. is engaged in the design, research, and development of application software for HTC-branded mobile communication devices.

JURISDICTION AND VENUE

167. Paragraph 167 contains legal conclusions to which no response is required. To the extent a response is required, HTC Defendants admit that Apple alleges an action under the patent laws of the United States, Title 35 of the United States Code, but specifically deny that they infringe the asserted Apple patents. HTC Defendants admit that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a), 2210, and 2202. HTC Defendants deny the remaining allegations of Paragraph 167.

168. Paragraph 168 contains legal conclusions to which no response is required. To the extent a response is required, HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 regarding Motorola and therefore they are denied.

169. Paragraph 169 contains legal conclusions to which no response is required. To the extent a response is required, HTC Defendants admit that some of the HTC Defendants develop and/or sell mobile communications devices that may have been sold and/or used within the state of Florida but deny the remainder of the allegations in Paragraph 169.

170. Paragraph 170 contains legal conclusions to which no response is required. To the extent a response is required, HTC Defendants deny the allegations in Paragraph 170.

RESPONSE TO FIRST COUNTERCLAIM – DECLARATORY JUDGMENT U.S. PATENT NO. 5,710,987 AGAINST MOTOROLA MOBILITY

171. Paragraph 171 contains legal conclusions to which no response is required.

172. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 and on that basis deny them.

A. Declaration of Noninfringement

173. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-172 above.

174. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174 and on that basis deny them.

175. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175 and on that basis deny them.

176. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176 and on that basis deny them.

B. Declaration of Invalidity

177. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-176 above.

178. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 178 and on that basis deny them.

179. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179 and on that basis deny them.

180. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180 and on that basis deny them.

**RESPONSE TO SECOND COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 5,754,119 AGAINST MOTOROLA MOBILITY**

181. Paragraph 181 contains legal conclusions to which no response is required.

182. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182 and on that basis deny them.

A. Declaration of Noninfringement

183. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-182 above.

184. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 and on that basis deny them.

185. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 and on that basis deny them.

186. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 and on that basis deny them.

B. Declaration of Invalidity

187. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-186 above.

188. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188 and on that basis deny them.

189. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189 and on that basis deny them.

190. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 and on that basis deny them.

**RESPONSE TO THIRD COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 5,958,006 AGAINST MOTOROLA MOBILITY**

191. Paragraph 191 contains legal conclusions to which no response is required.

192. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and on that basis deny them.

A. Declaration of Noninfringement

193. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-192 above.

194. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194 and on that basis deny them.

195. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195 and on that basis deny them.

196. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196 and on that basis deny them.

B. Declaration of Invalidity

197. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-196 above.

198. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198 and on that basis deny them.

199. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199 and on that basis deny them.

200. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200 and on that basis deny them.

C. Declaration of Unenforceability

201. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-200 above.

202. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 202 and on that basis deny them.

203. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 and on that basis deny them.

204. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204 and on that basis deny them.

**RESPONSE TO FOURTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 6,101,531 AGAINST MOTOROLA MOBILITY**

205. Paragraph 205 contains legal conclusions to which no response is required.

206. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205 and on that basis deny them.

A. Declaration of Noninfringement

207. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-206 above.

208. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208 and on that basis deny them.

209. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 209 and on that basis deny them.

210. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210 and on that basis deny them.

B. Declaration of Noninfringement

211. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-210 above.

212. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 and on that basis deny them.

213. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213 and on that basis deny them.

214. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214 and on that basis deny them.

**RESPONSE TO FIFTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 6,008,737 AGAINST MOTOROLA MOBILITY**

215. Paragraph 215 contains legal conclusions to which no response is required.

216. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216 and on that basis deny them.

A. Declaration of Noninfringement

217. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-216 above.

218. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218 and on that basis deny them.

219. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219 and on that basis deny them.

220. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220 and on that basis deny them.

B. Declaration of Invalidity

221. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-220 above.

222. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222 and on that basis deny them.

223. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223 and on that basis deny them.

224. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 224 and on that basis deny them.

**RESPONSE TO SIXTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 6,377,161 AGAINST MOTOROLA MOBILITY**

225. Paragraph 225 contains legal conclusions to which no response is required.

226. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226 and on that basis deny them.

A. Declaration of Noninfringement

227. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-226 above.

228. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228 and on that basis deny them.

229. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229 and on that basis deny them.

230. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230 and on that basis deny them.

B. Declaration of Invalidity

231. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-230 above.

232. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232 and on that basis deny them.

233. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233 and on that basis deny them.

234. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234 and on that basis deny them.

**RESPONSE TO SEVENTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 5,689,825 AGAINST MOTOROLA MOBILITY**

235. Paragraph 235 contains legal conclusions to which no response is required.

236. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235 and on that basis deny them.

A. Declaration of Noninfringement

237. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-236 above.

238. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238 and on that basis deny them.

239. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239 and on that basis deny them.

240. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240 and on that basis deny them.

B. Declaration of Invalidity

241. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-240 above.

242. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242 and on that basis deny them.

243. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243 and on that basis deny them.

244. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244 and on that basis deny them.

**RESPONSE TO EIGHTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 6,002,948 AGAINST MOTOROLA MOBILITY**

245. Paragraph 245 contains legal conclusions to which no response is required.

246. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246 and on that basis deny them.

A. Declaration of Noninfringement

247. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-246 above.

248. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248 and on that basis deny them.

249. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249 and on that basis deny them.

250. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250 and on that basis deny them.

B. Declaration of Invalidity

251. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-250 above.

252. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252 and on that basis deny them.

253. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253 and on that basis deny them.

254. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 254 and on that basis deny them.

**RESPONSE TO NINTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 6,463,534 AGAINST MOTOROLA MOBILITY**

255. Paragraph 255 contains legal conclusions to which no response is required.

256. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256 and on that basis deny them.

A. Declaration of Noninfringement

257. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-256 above.

258. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258 and on that basis deny them.

259. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259 and on that basis deny them.

260. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260 and on that basis deny them.

B. Declaration of Invalidity

261. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-260 above.

262. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262 and on that basis deny them.

263. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263 and on that basis deny them.

264. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264 and on that basis deny them.

**RESPONSE TO TENTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 7,024,183 AGAINST MOTOROLA MOBILITY**

265. Paragraph 265 contains legal conclusions to which no response is required.

266. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266 and on that basis deny them.

A. Declaration of Noninfringement

267. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-266 above.

268. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268 and on that basis deny them.

269. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269 and on that basis deny them.

270. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270 and on that basis deny them.

B. Declaration of Invalidity

271. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-270 above.

272. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272 and on that basis deny them.

273. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273 and on that basis deny them.

274. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274 and on that basis deny them.

**RESPONSE TO ELEVENTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 7,243,072 AGAINST MOTOROLA MOBILITY**

275. Paragraph 275 contains legal conclusions to which no response is required.

276. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276 and on that basis deny them.

A. Declaration of Noninfringement

277. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-276 above.

278. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278 and on that basis deny them.

279. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279 and on that basis deny them.

280. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280 and on that basis deny them.

B. Declaration of Invalidity

281. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-280 above.

282. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282 and on that basis deny them.

283. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283 and on that basis deny them.

284. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284 and on that basis deny them.

**RESPONSE TO TWELFTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 7,509,148 AGAINST MOTOROLA MOBILITY**

285. Paragraph 285 contains legal conclusions to which no response is required.

286. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286 and on that basis deny them.

A. Declaration of Noninfringement

287. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-286 above.

288. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288 and on that basis deny them.

289. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289 and on that basis deny them.

290. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290 and on that basis deny them.

B. Declaration of Invalidity

291. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-290 above.

292. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292 and on that basis deny them.

293. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293 and on that basis deny them.

294. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294 and on that basis deny them.

**RESPONSE TO THIRTEENTH COUNTERCLAIM – DECLARATORY JUDGMENT
U.S. PATENT NO. 5,583,560 AGAINST MOTOROLA MOBILITY**

295. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-293 above.

296. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 5,583,560 ("the '560 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '560 patent is attached to Apple's Affirmative Defenses and Counterclaims to Motorola's Original Complaint (Dk. 27) (hereafter "Counterclaims to Original Complaint") as Exhibit F. HTC Defendants admit that the copy of the '560 Patent is entitled "Method and Apparatus for Audio-Visual Interface for the Selective Display of Listing Information on a Display," and indicates an issue date of December 10, 1996. HTC Defendants admit that the copy of the '560 Patent lists the names of the inventors as Fabrice Florin, Michael Buettner, Glenn Corey, Janey Fritsche, Peter Maresca, Peter Miller, Bill Purdy, Stuart Sharpe and Nick West. Paragraph 296 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 296 and on that basis deny them.

297. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297 and on that basis deny them.

298. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298 and on that basis deny them.

299. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299 and on that basis deny them.

300. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300 and on that basis deny them.

301. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301 and on that basis deny them.

**RESPONSE TO FOURTEENTH COUNTERCLAIM – INFRINGEMENT OF U.S.
PATENT NO. 5,594,509 AGAINST MOTOROLA MOBILITY**

302. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-301 above.

303. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 5,594,509 ("the '509 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '509 Patent is attached to the Counterclaims to Original Complaint (Dk. 27) as Exhibit G. HTC Defendants admit that the copy of the '509 Patent is entitled "Method and Apparatus for Audio-Visual Interface for the Display of Multiple Levels of Information on a Display," and indicates an issue date of January 14, 1997. HTC Defendants admit that the copy of the '509 Patent lists the names of the inventors as Fabrice Florin, Michael Buettner, Glenn Corey, Janey Fritsche, Peter Maresca, Peter Miller, Bill Purdy, Stuart Sharpe and Nick West. Paragraph 303 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 303 and on that basis deny them.

304. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304 and on that basis deny them.

305. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305 and on that basis deny them.

306. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306 and on that basis deny them.

307. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307 and on that basis deny them.

308. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308 and on that basis deny them.

RESPONSE TO FIFTEENTH COUNTERCLAIM – INFRINGEMENT OF U.S. PATENT NO. 5,621,456 AGAINST MOTOROLA MOBILITY

309. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-308 above.

310. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 5,621,456 ("the '456 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '456 Patent is attached to the Counterclaims to Original Complaint (Dk. 27) as Exhibit H. HTC Defendants admit that the copy of the '456 Patent is entitled "Methods and Apparatus for Audio-Visual Interface for the Display of Multiple Program Categories," and indicates an issue date of April 15, 1997. HTC Defendants admit that the copy of the '456 Patent lists the names of the inventors as Fabrice Florin, Michael Buettner, Glenn Corey, Janey Fritsche, Peter Maresca, Peter Miller, Bill Purdy, Stuart Sharpe and Nick West. Paragraph 310 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a

belief as to the truth of the remainder of the allegations contained in Paragraph 310 and on that basis deny them.

311. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311 and on that basis deny them.

312. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312 and on that basis deny them.

313. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313 and on that basis deny them.

314. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 and on that basis deny them.

315. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315 and on that basis deny them.

**RESPONSE TO SIXTEENTH COUNTERCLAIM – INFRINGEMENT OF U.S. PATENT
NO. 7,657,849 AGAINST MOTOROLA MOBILITY**

316. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-315 above.

317. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 7,657,849 ("the '849 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '849 Patent is attached to the Counterclaims to Original Complaint (Dk. 27) as Exhibit I. HTC Defendants admit that the copy of the '849 Patent is entitled "Unlocking a Device by Performing Gestures on an Unlock Image," and indicates an issue date of February 2, 2010. HTC Defendants admit that the copy of the '849 Patent lists the names of the inventors as Imran Chaudhri, Bas Ording, Freddy Allen Anzures, Marcel Van Os,

Stephen O. Lemay, Scott Forstall, and Greg Christie. Paragraph 317 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 317 and on that basis deny them.

318. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 318 and on that basis deny them.

319. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 319 and on that basis deny them.

320. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 320 and on that basis deny them.

321. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321 and on that basis deny them.

RESPONSE TO SEVENTEENTH COUNTERCLAIM – INFRINGEMENT OF U.S. PATENT NO. 8,046,721 AGAINST MOTOROLA MOBILITY

322. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-321 above.

323. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 8,046,721 ("the '721 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '721 Patent is attached to the Counterclaims to the Original Complaint (Dk. 27) as Exhibit J. HTC Defendants admit that the copy of the '721 Patent is entitled "Unlocking a Device by Performing Gestures on an Unlock Image" and indicates an issue date of October 25, 2011. HTC Defendants admit that the copy of the '721 Patent lists the names of the inventors as Imran Chaudhri, Bas Ording, Freddy Allen Anzures, Marcel Van Os,

Stephen O. Lemay, Scott Forstall, and Greg Christie. Paragraph 323 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 323 and on that basis deny them.

324. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 324 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 324.

325. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 325.

326. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 326.

327. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 327.

**RESPONSE TO EIGHTEENTH COUNTERCLAIM – INFRINGEMENT OF U.S.
PATENT NO. 7,853,891 AGAINST MOTOROLA MOBILITY AND HTC**

328. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-327 above.

329. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 7,853,891 ("the '891 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '891 Patent is attached to the Counterclaims to the Original Complaint (Dk. 27) as Exhibit K. HTC Defendants admit that the copy of the '891 Patent is entitled "Method and Apparatus for Displaying a Window for a User Interface" and indicates an issue date of December 14, 2010. HTC Defendants admit that the copy of the '891 Patent lists the names of the inventors as Imran Chaudhri and Bas Ording. Paragraph 329 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 329 and on that basis deny them.

330. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 330.

331. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 331.

332. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 332 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 332.

333. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 333.

**RESPONSE TO NINETEENTH COUNTERCLAIM – INFRINGEMENT OF U.S.
PATENT NO. 8,014,760 AGAINST MOTOROLA MOBILITY AND HTC**

334. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-333 above.

335. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 8,014,760 ("the '760 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '760 Patent is attached to the Counterclaims to the Original Complaint (Dk. 27) as Exhibit L. HTC Defendants admit that the copy of the '760 Patent is entitled "Missed Telephone Call Management for a Portable Multifunction Device," and indicates an issue date of September 6, 2011. HTC Defendants admit that the copy of the '760 Patent lists the names of the inventors as Scott Forstall, Gregg Christie, Scott Herz, Imran Chaudhri, Michael Matas, Marcel Van Os, and Stephen O. Lemay. Paragraph 335 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 335 and on that basis deny them.

336. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 336.

337. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 337.

338. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 338 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 338.

339. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 339.

**RESPONSE TO TWENTIETH COUNTERCLAIM – INFRINGEMENT OF U.S.
PATENT NO. 8,031,050 AGAINST MOTOROLA MOBILITY AND HTC**

340. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-339 above.

341. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 8,031,050 ("the '050 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '050 Patent is attached to the Counterclaims to the Original Complaint (Dk. 27) as Exhibit M. HTC Defendants admit that the copy of the '050 Patent is entitled "System and Method for Situational Location Relevant Invocable Speed Reference," and indicates an issue date of October 4, 2011. HTC Defendants admit that the copy of the '050 Patent lists the name of the inventor as William Johnson. Paragraph 341 otherwise contains legal

conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 341 and on that basis deny them.

342. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 342 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 342.

343. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 343.

344. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 344.

345. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 345.

**RESPONSE TO TWENTY-FIRST COUNTERCLAIM – INFRINGEMENT OF U.S.
PATENT NO. 8,074,172 AGAINST MOTOROLA MOBILITY AND HTC**

346. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-345 above.

347. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 8,074,172 ("the '172 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '172 Patent is attached to the Counterclaims to the Original Complaint (Dk. 27) as Exhibit N. HTC Defendants admit that the copy of the '172 Patent is entitled "Method, System, and Graphical User Interface for Providing Word Recommendations," and indicates an issue date of December 6, 2011. HTC Defendants admit that the copy of the '172 Patent lists the names of the inventors as Kenneth Kocienda and Bas Ording. Paragraph 347 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 347 and on that basis deny them.

348. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 348.

349. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 349.

350. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350 regarding alleged infringement by Motorola and

therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 350.

351. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 351.

RESPONSE TO TWENTY-SECOND COUNTERCLAIM – INFRINGEMENT OF U.S. PATENT NO. 8,099,332 AGAINST MOTOROLA MOBILITY AND HTC

352. HTC Defendants repeat and incorporate their responses set forth in paragraphs 161-351 above.

353. HTC Defendants lack knowledge or information sufficient to form a belief regarding Apple's allegation that it is the owner of the entire right, title, and interest to and in U.S. Patent No. 8,099,332 ("the '332 patent") and therefore it is denied. HTC Defendants admit that what purports to be a copy of the '332 Patent is attached to the Counterclaims to the Original Complaint (Dk. 27) as Exhibit O. HTC Defendants admit that the copy of the '332 Patent is entitled "User Interface for Application Management for a Mobile Device," and indicates an issue date of January 17, 2012. HTC Defendants admit that the copy of the '332 Patent lists the names of the inventors as Steve Lemay and Sean Kelly. Paragraph 353 otherwise contains legal conclusions to which no response is required. To the extent a response is required, Defendants lack knowledge or information sufficient to form a belief as to the truth of the remainder of the allegations contained in Paragraph 353 and on that basis deny them.

354. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354 regarding alleged infringement by Motorola and

therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 354.

355. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 355.

356. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 356.

357. HTC Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357 regarding alleged infringement by Motorola and therefore they are denied. HTC Defendants deny the remaining allegations contained in Paragraph 357.

RESPONSE TO REQUEST FOR RELIEF

HTC Defendants deny each allegation of the Counterclaims not expressly admitted herein and deny that Apple is entitled to any of the relief requested in the Counterclaims.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

(Invalidity of the Asserted Patents)

358. The '721 Patent, '891 Patent, '760 Patent, '050 Patent, '172 Patent, and '332 Patent, and each of the claims thereof are invalid for failure to comply with one or more of the conditions for patentability set forth in Title 35 of the United States Code, including, but not limited to, utility, novelty, non-obviousness, enablement, written description and definiteness in

accordance with 35 U.S.C. §§ 101, 102, 103, 112, and/or 116, or are invalid pursuant to the judicial doctrine barring double-patenting.

SECOND AFFIRMATIVE DEFENSE

(Non-Infringement of the Asserted Patents)

359. HTC Defendants have not infringed, are not infringing, and will not infringe any of the claims of the '721 Patent, '891 Patent, '760 Patent, '050 Patent, '172 Patent, or '332 Patent, either directly or indirectly, contributorily or by inducement, literally or under the doctrine of equivalents.

THIRD AFFIRMATIVE DEFENSE

(Prosecution History Estoppel)

360. An additional basis of non-infringement is that statements, representations, admissions, and amendments made to the United States Patent and Trademark Office during the prosecution of the applications which matured into the '721 Patent, '891 Patent, '760 Patent, '050 Patent, '172 Patent, and '332 Patent, and/or their parent applications, as well as the prior art, estops Apple from asserting that the claims of said patents are infringed by HTC Defendants' products.

FOURTH AFFIRMATIVE DEFENSE

(Laches)

361. Apple is estopped from asserting the '721 Patent, '891 Patent, '760 Patent, '050 Patent, '172 Patent, and '332 Patent, and each of the claims thereof to the extent Apple unreasonably delayed in filing suit against Defendants.

FIFTH AFFIRMATIVE DEFENSE

(Marking and Notice)

362. Apple's claim for damages for the alleged infringement of the '721 Patent, '891 Patent, '760 Patent, '050 Patent, '172 Patent, and '332 Patent is barred, in whole or in part, for failure to allege compliance with, and failure to comply with, the marking and/or notice requirements of 35 U.S.C. § 287.

SIXTH AFFIRMATIVE DEFENSE

(License)

363. Upon information and belief, Apple has licensing agreements with certain third party suppliers. Pursuant to the terms of these licensing agreements, these suppliers provide components and/or software that are purchased by Defendants and incorporated into accused products. Therefore, Defendants are licensed to perform some or all of the acts alleged to infringe the '721 Patent, '891 Patent, '760 Patent, '050 Patent, '172 Patent, and '332 Patent.

SEVENTH AFFIRMATIVE DEFENSE

(Acquiescence, Estoppel, or Waiver)

364. Upon information and belief, Apple has made claims that are barred in whole or in part by the doctrines of acquiescence, estoppel, or waiver.

EIGHTH AFFIRMATIVE DEFENSE

(Failure to State a Claim Upon Which Relief Can Be Granted)

365. Upon information and belief, Apple has failed to state a claim against the HTC Defendants upon which relief may be granted.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Defendants and Counterclaimants demand a trial by Jury on all issues so triable.

Dated: June 26, 2012

Respectfully submitted,

CAREY RODRIGUEZ GREENBERG
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 26, 2012, I electronically filed the foregoing document with the clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the below Service List, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ John C. Carey

John C. Carey

SERVICE LIST

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Case No. 12-cv-20271-Scola/Bandstra
United States District Court for the Southern District of Florida

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