

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Parallel Networks, LLC,	§	
	§	Civil Action No. 6:10-cv-491
v.	§	
	§	JURY
Adidas America, Inc., <i>et al.</i>	§	

ANSWER TO ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Defendant, General Motors LLC, by counsel, as and for its Answer, Defenses and Counterclaims to the Complaint by Plaintiff Parallel Networks, LLC (“Parallel Networks”), denying Parallel Networks’ allegations except those expressly admitted herein, responds as follows:

The Parties

1. Parallel Networks LLC (“Parallel Networks” or “Plaintiff”) is a Texas Limited Liability Company with its place of business at 100 E. Ferguson Street, Suite 602, in Tyler, Texas.

RESPONSE TO PARAGRAPH NO. 1:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 1 and, therefore, denies the same.

2. On information and belief, Defendant ADIDAS AMERICA, INC., is a corporation with a place of business in Portland, Oregon.

RESPONSE TO PARAGRAPH NO. 2:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 2 and, therefore, denies the same.

3. On information and belief, Defendant ADIDAS INTERACTIVE, INC., is a corporation with a place of business in Portland, Oregon.

RESPONSE TO PARAGRAPH NO. 3:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 3 and, therefore, denies the same.

4. On information and belief, Defendant AEROPOSTALE, INC., is a corporation with a place of business in New York, New York.

RESPONSE TO PARAGRAPH NO. 4:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 4 and, therefore, denies the same.

5. On information and belief, Defendant AMERICAN GIRL, LLC, is a corporation with a place of business in Middleton, Wisconsin.

RESPONSE TO PARAGRAPH NO. 5:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 5 and, therefore, denies the same.

6. On information and belief, Defendant AMERICAN SUZUKI MOTOR CORPORATION is a corporation with a place of business in Brea, California.

RESPONSE TO PARAGRAPH NO. 6:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 6 and, therefore, denies the same.

7. On information and belief, Defendant ANDERSEN CORPORATION is a corporation with a place of business in Bayport, Minnesota.

RESPONSE TO PARAGRAPH NO. 7:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 7 and, therefore, denies the same.

8. On information and belief, Defendant ANDERSEN WINDOWS, INC., is a corporation with a place of business in Bayport, Minnesota.

RESPONSE TO PARAGRAPH NO. 8:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 8 and, therefore, denies the same.

9. On information and belief, Defendant ASICS AMERICA CORPORATION is a corporation with a place of business in Irvine, California.

RESPONSE TO PARAGRAPH NO. 9:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 9 and, therefore, denies the same.

10. On information and belief, Defendant AT&T INC., is a corporation with a place of business in Dallas, Texas.

RESPONSE TO PARAGRAPH NO. 10:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 10 and, therefore, denies the same.

11. On information and belief, Defendant BBY SOLUTIONS, INC., is a corporation with a place of business in Richfield, Minnesota.

RESPONSE TO PARAGRAPH NO. 11:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 11 and, therefore, denies the same.

12. On information and belief, Defendant BERGDORFGOODMAN.COM, LLC, is a corporation with a place of business in Dallas, Texas.

RESPONSE TO PARAGRAPH NO. 12:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 12 and, therefore, denies the same.

13. On information and belief, Defendant BESTBUY.COM, LLC, is a corporation with a place of business in Richfield, Minnesota.

RESPONSE TO PARAGRAPH NO. 13:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 13 and, therefore, denies the same.

14. On information and belief, Defendant BLOOMINGDALE'S, INC. is a corporation with a place of business in New York, New York.

RESPONSE TO PARAGRAPH NO. 14:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 14 and, therefore, denies the same.

15. On information and belief, Defendant BRIGGS & STRATTON CORPORATION is a corporation with a place of business in Wauwatosa, Wisconsin.

RESPONSE TO PARAGRAPH NO. 15:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 15 and, therefore, denies the same.

16. On information and belief, Defendant BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC, is a corporation with a place of business in Jefferson, Wisconsin.

RESPONSE TO PARAGRAPH NO. 16:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 16 and, therefore, denies the same.

17. On information and belief, Defendant BRUNSWICK BILLIARDS, INC., is a corporation with a place of business in Bristol, Wisconsin.

RESPONSE TO PARAGRAPH NO. 17:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 17 and, therefore, denies the same.

18. On information and belief, Defendant BRUNSWICK CORPORATION is a corporation with a place of business in Lake Forest, Illinois.

RESPONSE TO PARAGRAPH NO. 18:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 18 and, therefore, denies the same.

19. On information and belief, Defendant CATERPILLAR INC. is a corporation with a place of business in Peoria, Illinois.

RESPONSE TO PARAGRAPH NO. 19:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 19 and, therefore, denies the same.

20. On information and belief, Defendant CHICO 'S RETAIL SERVICES, INC., is a corporation with a place of business in Fort Myers, Florida.

RESPONSE TO PARAGRAPH NO. 20:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 20 and, therefore, denies the same.

21. On information and belief, Defendant CITIZEN WATCH COMPANY OF AMERICA, INC., is a corporation with a place of business in Torrance, California.

RESPONSE TO PARAGRAPH NO. 21:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 21 and, therefore, denies the same.

22. On information and belief, Defendant DILLARD'S, INC., is a corporation with a place of business in Little Rock, Arkansas.

RESPONSE TO PARAGRAPH NO. 22:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 22 and, therefore, denies the same.

23. On information and belief, Defendant EASTMAN KODAK COMPANY is a corporation with a place of business in Rochester, New York.

RESPONSE TO PARAGRAPH NO. 23:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 23 and, therefore, denies the same.

24. On information and belief, Defendant GENERAL MOTORS LLC is a corporation with a place of business in Detroit, Michigan.

RESPONSE TO PARAGRAPH NO. 24:

General Motors LLC admits the allegations in Paragraph 24.

25. On information and belief, Defendant THE GILLETTE COMPANY is a corporation with a place of business in Boston, Massachusetts.

RESPONSE TO PARAGRAPH NO. 25:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 25 and, therefore, denies the same.

26. On information and belief, Defendant THE GOODYEAR TIRE & RUBBER COMPANY is a corporation with a place of business in Akron, Ohio.

RESPONSE TO PARAGRAPH NO. 26:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 26 and, therefore, denies the same.

27. On information and belief, Defendant H-D MICHIGAN, INC., is a corporation with a place of business in Ann Arbor, Michigan.

RESPONSE TO PARAGRAPH NO. 27:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 27 and, therefore, denies the same.

28. On information and belief, Defendant HARLEY-DAVIDSON, INC., is a corporation with a place of business in Milwaukee, Wisconsin.

RESPONSE TO PARAGRAPH NO. 28:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 28 and, therefore, denies the same.

29. On information and belief, Defendant HASBRO, INC. is a corporation with a place of business in Omaha, Nebraska.

RESPONSE TO PARAGRAPH NO. 29:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 29 and, therefore, denies the same.

30. On information and belief, Defendant HAYNEEDLE, INC. is a corporation with a place of business in Omaha, Nebraska.

RESPONSE TO PARAGRAPH NO. 30:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 30 and, therefore, denies the same.

31. On information and belief, Defendant HERMAN MILLER, INC., is a corporation with a place of business in Zeeland, Michigan.

RESPONSE TO PARAGRAPH NO. 31:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 31 and, therefore, denies the same.

32. On information and belief, Defendant HSN INTERACTIVE LLC is a corporation with a place of business in St. Petersburg, Florida.

RESPONSE TO PARAGRAPH NO. 32:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 32 and, therefore, denies the same.

33. On information and belief, Defendant HSN LP is a corporation with a place of business in St. Petersburg, Florida.

RESPONSE TO PARAGRAPH NO. 33:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 33 and, therefore, denies the same.

34. On information and belief, Defendant THE J. JILL GROUP, INC., is a corporation with a place of business in Tilton, New Hampshire.

RESPONSE TO PARAGRAPH NO. 34:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 34 and, therefore, denies the same.

35. On information and belief, Defendant JILL ACQUISITION LLC, is a corporation with a place of business in Tilton, New Hampshire.

RESPONSE TO PARAGRAPH NO. 35:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 35 and, therefore, denies the same.

36. On information and belief, Defendant JONES INVESTMENT COMPANY, INC., is a corporation with a place of business in Wilmington, Delaware.

RESPONSE TO PARAGRAPH NO. 36:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 36 and, therefore, denies the same.

37. On information and belief, Defendant JONES RETAIL CORPORATION is a corporation with a place of business in Emeryville, California.

RESPONSE TO PARAGRAPH NO. 37:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 37 and, therefore, denies the same.

38. On information and belief, Defendant KODAK IMAGING NETWORK, INC., is a corporation with a place of business in Emeryville, California.

RESPONSE TO PARAGRAPH NO. 38:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 38 and, therefore, denies the same.

39. On information and belief, Defendant KOHL'S DEPARTMENT STORES, INC., is a corporation with a place of business in Menomonee Falls, Wisconsin.

RESPONSE TO PARAGRAPH NO. 39:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 39 and, therefore, denies the same.

40. On information and belief, Defendant LG ELECTRONICS USA, INC., is a corporation with a place of business in Englewood Cliffs, New Jersey.

RESPONSE TO PARAGRAPH NO. 40:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 40 and, therefore, denies the same.

41. On information and belief, Defendant MACY'S WEST STORES, INC., is a corporation with a place of business in Cincinnati, Ohio.

RESPONSE TO PARAGRAPH NO. 41:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 41 and, therefore, denies the same.

42. On information and belief, Defendant MACYS.COM, INC., is a corporation with a place of business in San Francisco, California.

RESPONSE TO PARAGRAPH NO. 42:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 42 and, therefore, denies the same.

43. On information and belief, Defendant MATTEL, INC., is a corporation with a place of business in El Segundo, California.

RESPONSE TO PARAGRAPH NO. 43:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 43 and, therefore, denies the same.

44. On information and belief, Defendant MITSUBISHI MOTOR SALES OF AMERICA, INC., is a corporation with a place of business in Cypress, California.

RESPONSE TO PARAGRAPH NO. 44:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 44 and, therefore, denies the same.

45. On information and belief, Defendant MITSUBISHI MOTORS NORTH AMERICA, INC., is a corporation with a place of business in Cypress, California.

RESPONSE TO PARAGRAPH NO. 45:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 45 and, therefore, denies the same.

46. On information and belief, Defendant MOTOROLA, INC., is a corporation with a place of business in Schaumburg, Illinois.

RESPONSE TO PARAGRAPH NO. 46:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 46 and, therefore, denies the same.

47. On information and belief, Defendant MOTOROLA TRADEMARK HOLDINGS, LLC, is a corporation with a place of business in Libertyville, Illinois.

RESPONSE TO PARAGRAPH NO. 47:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 47 and, therefore, denies the same.

48. On information and belief, Defendant NAUTICA APPAREL, INC., is a corporation with a place of business in New York, New York.

RESPONSE TO PARAGRAPH NO. 48:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 48 and, therefore, denies the same.

49. On information and belief, Defendant NAUTICA RETAIL USA, INC., is a corporation with a place of business in New York, New York.

RESPONSE TO PARAGRAPH NO. 49:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 49 and, therefore, denies the same.

50. On information and belief, Defendant NAVISTAR, INC. is a corporation with a place of business in Warrenville, Illinois.

RESPONSE TO PARAGRAPH NO. 50:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 50 and, therefore, denies the same.

51. On information and belief, Defendant NEW BALANCE ATHLETIC SHOE, INC., is a corporation with a place of business in Boston, Massachusetts.

RESPONSE TO PARAGRAPH NO. 51:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 51 and, therefore, denies the same.

52. On information and belief, Defendant NISSAN NORTH AMERICA, INC., is a corporation with a place of business in Franklin, Tennessee.

RESPONSE TO PARAGRAPH NO. 52:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 52 and, therefore, denies the same.

53. On information and belief, Defendant PRL USA HOLDINGS, INC., is a corporation with a place of business in Wilmington, Delaware.

RESPONSE TO PARAGRAPH NO. 53:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 53 and, therefore, denies the same.

54. On information and belief, Defendant THE PROCTER & GAMBLE COMPANY is a corporation with a place of business in Cincinnati, Ohio.

RESPONSE TO PARAGRAPH NO. 54:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 54 and, therefore, denies the same.

55. On information and belief, Defendant RALPH LAUREN MEDIA LLC is a corporation with a place of business in New York, New York.

RESPONSE TO PARAGRAPH NO. 55:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 55 and, therefore, denies the same.

56. On information and belief, Defendant RUSSELL BRANDS, INC., is a corporation with a place of business in Bowling Green, Kentucky.

RESPONSE TO PARAGRAPH NO. 56:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 56 and, therefore, denies the same.

57. On information and belief, Defendant SUBARU OF AMERICA, INC., is a corporation with a place of business in Cherry Hill, New Jersey.

RESPONSE TO PARAGRAPH NO. 57:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 57 and, therefore, denies the same.

58. On information and belief, Defendant SUNGLASS HUT TRADING, LLC, is a corporation with a place of business in Mason, Ohio.

RESPONSE TO PARAGRAPH NO. 58:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 58 and, therefore, denies the same.

59. On information and belief, Defendant VICTORIA’S SECRET is a corporation with a place of business in Columbus, Ohio.

RESPONSE TO PARAGRAPH NO. 59:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 59 and, therefore, denies the same.

60. On information and belief, Defendant WOLVERINE WORLD WIDE, INC., is a corporation with a place of business in Rockford, Michigan.

RESPONSE TO PARAGRAPH NO. 60:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 60 and, therefore, denies the same.

61. On information and belief, Defendant WOMEN’S APPAREL GROUP, LLC d/b/a BOSTON APPAREL GROUP, LLC (“WOMEN’S APPAREL GROUP, LLC”), is a corporation with a place of business in West Bridgewater, Massachusetts.

RESPONSE TO PARAGRAPH NO. 61:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 61 and, therefore, denies the same.

JURISDICTION AND VENUE

62. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). On information and belief, Defendants are subject to this Court’s specific and general personal jurisdiction, pursuant to due process and/or the Texas Long Arm Statute, due at least to their substantial business in this forum, including at least a portion of the infringements alleged herein. Without limitation, on information and belief, within this state the Defendants have made and used the patented invention and have induced and contributed to that infringement with the systems identified herein below. In addition, on information and belief, Defendants have derived substantial revenues from their infringing acts. Further, on information

and belief, Defendants are subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Texas. Further, on information and belief, Defendants are subject to the Court's personal jurisdiction at least due to their interactive websites accessible from Texas.

RESPONSE TO PARAGRAPH NO. 62:

General Motors LLC admits that this action arises under the patent laws of the United States, Title 35 of the United States Code and that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). General Motors LLC also admits that it is subject to this Court's personal jurisdiction. General Motors LLC denies the remaining allegations in Paragraph 62 as applied to General Motors LLC. General Motors LLC lacks sufficient information to admit or deny the remaining allegations of Paragraph 62 as applied to the other defendants, and therefore, denies the same.

63. Venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b). On information and belief, from and within this Judicial District each Defendant has committed at least a portion of the infringements at issue in this case. Without limitation, on information and belief, within this district the Defendants have engaged in, contributed to, and induced the infringing acts identified in this Complaint. In addition, on information and belief, Defendants have derived substantial revenues from their infringing acts and are subject to personal jurisdiction in this District for at least the reasons identified above with respect to personal jurisdiction within the State of Texas. Further, on information and belief, Defendants are subject to the Court's personal jurisdiction in this District at least due to their interactive websites accessible from this District.

RESPONSE TO PARAGRAPH NO. 63:

General Motors LLC denies that venue is proper in this district under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b), and it reserves its rights to move to transfer due to a more convenient or more appropriate venue under 28 U.S.C. § 1404, at a minimum. General Motors LLC denies the remaining allegations in Paragraph 63 as applied to General Motors LLC. General Motors LLC lacks sufficient information to admit or deny the remaining allegations of Paragraph 63 as applied to the other defendants, and therefore, denies the same.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,446,111

64. United States Patent No. 6,446,111 (“the ‘111 patent”) entitled “Method and Apparatus for Client-Server Communication Using a Limited Capability Client Over a Low-Speed Communications Link” issued on September 3, 2002.

RESPONSE TO PARAGRAPH NO. 64:

General Motors LLC admits the allegations in Paragraph 64.

65. Parallel Networks is the assignee of all right, title and interest in the ‘111 patent. Accordingly, Parallel Networks has standing to bring this lawsuit for infringement of the ‘111 patent.

RESPONSE TO PARAGRAPH NO. 65:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 65 and, therefore, denies the same.

66. At least one claim of the ‘111 patents covers, inter alia, various systems and methods comprising a server coupled to a communications link that receives a request from a client device and collects data items as a function of the request; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with the applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 66:

To the extent that this allegation purports to characterize what the claims “cover,” this allegation states a legal conclusion to which no response is required. To the extent a response is required, General Motors LLC lacks sufficient information to admit or deny the allegations of Paragraph 66 and, therefore, denies the same.

67. On information and belief, Defendant ADIDAS AMERICA, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.shopadidas.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable

applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 67:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 67 and, therefore, denies the same.

68. On information and belief, since becoming aware of the ‘111 patent, ADIDAS AMERICA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.shopadidas.com for use by ADIDAS AMERICA, INC.’s clients. ADIDAS AMERICA, INC. is a direct and indirect infringer, and its clients using www.shopadidas.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 68:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 68 and, therefore, denies the same.

69. On information and belief, since becoming aware of the ‘111 patent ADIDAS AMERICA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, ADIDAS AMERICA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, ADIDAS AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 69:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 69 and, therefore, denies the same.

70. Defendant ADIDAS AMERICA, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 70:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 70 and, therefore, denies the same.

71. On information and belief, Defendant ADIDAS INTERACTIVE, INC. has been and now is infringing at least claim 1 of ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.shopadidas.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 71:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 71 and, therefore, denies the same.

72. On information and belief, since becoming aware of the ‘111 patent, ADIDAS INTERACTIVE, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.shopadidas.com for use by ADIDAS INTERACTIVE, INC.’s clients. ADIDAS INTERACTIVE, INC. is a direct and indirect infringer, and its clients using www.shopadidas.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 72:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 72 and, therefore, denies the same.

73. On information and belief, since becoming aware of the ‘111 patent ADIDAS INTERACTIVE, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its client and by aiding and abetting its use. On information and belief, ADIDAS INTERACTIVE, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, ADIDAS AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for

infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 73:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 73 and, therefore, denies the same.

74. Defendant ADIDAS INTERACTIVE, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 74:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 74 and, therefore, denies the same.

75. On information and belief, Defendant AEROPOSTALE, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.aeropostale.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 75:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 75 and, therefore, denies the same.

76. On information and belief, since becoming aware of the ‘111 patent, AEROPOSTALE, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.aeropostale.com for use by AEROPOSTALE, INC.’s clients. AEROPOSTALE, INC. is a direct and indirect infringer, and its clients using www.aeropostale.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 76:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 76 and, therefore, denies the same.

77. On information and belief, since becoming aware of the ‘111 patent AEROPOSTALE, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, AEROPOSTALE, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, AEROPOSTALE, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its client knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 77:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 77 and, therefore, denies the same.

78. Defendant AEROPOSTALE, INC.. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 78:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 78 and, therefore, denies the same.

79. On information and belief, Defendant AMERICAN GIRL, LLC has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.americangirl.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 79:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 79 and, therefore, denies the same.

80. On information and belief, since becoming aware of the ‘111 patent, AMERICAN GIRL, LLC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.americangirl.com for use by AMERICAN GIRL, LLC.’s clients. AMERICAN GIRL, LLC. is a direct and indirect infringer, and its clients using www.americangirl.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 80:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 80 and, therefore, denies the same.

81. On information and belief, since becoming aware of the ‘111 patent AMERICAN GIRL, LLC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, AMERICAN GIRL, LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, AMERICAN GIRL, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 81:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 81 and, therefore, denies the same.

82. Defendant AMERICAN GIRL, LLC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 82:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 82 and, therefore, denies the same.

83. On information and belief, Defendant AMERICAN SUZUKI MOTOR CORPORATION has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.suzukicycles.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 83:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 83 and, therefore, denies the same.

84. On information and belief, since becoming aware of the '111 patent, AMERICAN SUZUKI MOTOR CORPORATION. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.suzukicycles.com for use by AMERICAN SUZUKI MOTOR CORPORATION's clients. AMERICAN SUZUKI MOTOR CORPORATION is a direct and indirect infringer, and its clients using www.suzukicycles.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 84:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 84 and, therefore, denies the same.

85. On information and belief, since becoming aware of the '111 patent AMERICAN SUZUKI MOTOR CORPORATION is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, AMERICAN SUZUKI MOTOR CORPORATION knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, AMERICAN SUZUKI MOTOR CORPORATION is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 85:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 85 and, therefore, denies the same.

86. Defendant AMERICAN SUZUKI MOTOR CORPORATION is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 86:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 86 and, therefore, denies the same.

87. On information and belief, Defendant ANDERSEN CORPORATION has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.andersenstormdoorsathomedepot.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 87:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 87 and, therefore, denies the same.

88. On information and belief, since becoming aware of the '111 patent, ANDERSEN CORPORATION has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.andersenstormdoorsathomedepot.com for use by ANDERSEN CORPORATION's clients. ANDERSEN CORPORATION is a direct and indirect infringer, and its clients using www.andersenstormdoorsathomedepot.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 88:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 88 and, therefore, denies the same.

89. On information and belief, since becoming aware of the ‘111 patent ANDERSEN CORPORATION is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, ANDERSEN CORPORATION knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, ANDERSEN CORPORATION is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 89:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 89 and, therefore, denies the same.

90. Defendant ANDERSEN CORPORATION is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 90:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 90 and, therefore, denies the same.

91. On information and belief, Defendant ANDERSEN WINDOWS, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.andersenstormdoorsathomedepot.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 91:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 91 and, therefore, denies the same.

92. On information and belief, since becoming aware of the ‘111 patent, ANDERSEN WINDOWS, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in

this judicial district, and elsewhere in the United States, by providing the website www.andersenstormdoorsathomedepot.com for use by ANDERSEN WINDOWS, INC.'s clients. ANDERSEN WINDOWS, INC. is a direct and indirect infringer, and its clients using www.andersenstormdoorsathomedepot.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 92:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 92 and, therefore, denies the same.

93. On information and belief, since becoming aware of the '111 patent ANDERSEN WINDOWS, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, ANDERSEN WINDOWS, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, ANDERSEN WINDOWS, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 93:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 93 and, therefore, denies the same.

94. Defendant ANDERSEN WINDOWS, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 94:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 94 and, therefore, denies the same.

95. On information and belief, Defendant ASICS AMERICA CORPORATION has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.asicsamerica.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of

operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 95:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 95 and, therefore, denies the same.

96. On information and belief, since becoming aware of the ‘111 patent, ASICS AMERICA CORPORATION has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.asicsamerica.com for use by ASICS AMERICA CORPORATION’s clients. ASICS AMERICA CORPORATION is a direct and indirect infringer, and its clients using www.asicsamerica.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 96:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 96 and, therefore, denies the same.

97. On information and belief, since becoming aware of the ‘111 patent ASICS AMERICA CORPORATION is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, ASICS AMERICA CORPORATION knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, ASICS AMERICA CORPORATION is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article of commodity or commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 97:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 97 and, therefore, denies the same.

98. Defendant ASICS AMERICA CORPORATION is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 98:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 98 and, therefore, denies the same.

99. On information and belief, Defendant AT&T INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.bellsouth.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 99:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 99 and, therefore, denies the same.

100. On information and belief, since becoming aware of the '111 patent, AT&T INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.bellsouth.com for use by AT&T INC.'s clients. AT&T INC. is a direct and indirect infringer, and its clients using www.bellsouth.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 100:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 100 and, therefore, denies the same.

101. On information and belief, since becoming aware of the '111 patent AT&T INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, AT&T INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, AT&T INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article of commodity or commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 101:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 101 and, therefore, denies the same.

102. Defendant AT&T INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 102:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 102 and, therefore, denies the same.

103. On information and belief, Defendant BBY SOLUTIONS, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.bestbuy.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 103:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 103 and, therefore, denies the same.

104. On information and belief, since becoming aware of the '111 patent, BBY SOLUTIONS, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.bestbuy.com for use by BBY SOLUTIONS, INC.'s clients. BBY SOLUTIONS, INC. is a direct and indirect infringer, and its clients using www.bestbuy.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 104:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 104 and, therefore, denies the same.

105. On information and belief, since becoming aware of the ‘111 patent BBY SOLUTIONS, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BBY SOLUTIONS, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BBY SOLUTIONS, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 105:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 105 and, therefore, denies the same.

106. Defendant BBY SOLUTIONS, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 106:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 106 and, therefore, denies the same.

107. On information and belief, Defendant BERGDORFGOODMAN.COM, LLC has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.bergdorfgoodman.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 107:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 107 and, therefore, denies the same.

108. On information and belief, since becoming aware of the ‘111 patent, BERGDORFGOODMAN.COM, LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent

in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.bergdorfgoodman.com for use by BERGDORFGOODMAN.COM, LLC's clients. BERGDORFGOODMAN.COM, LLC is a direct and indirect infringer, and its clients using www.bergdorfgoodman.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 108:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 108 and, therefore, denies the same.

109. On information and belief, since becoming aware of the '111 patent BERGDORFGOODMAN.COM, LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BERGDORFGOODMAN.COM, LLC knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, BERGDORFGOODMAN.COM, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 109:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 109 and, therefore, denies the same.

110. Defendant ASICS BERGDORFGOODMAN.COM, LLC is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 110:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 110 and, therefore, denies the same.

111. On information and belief, Defendant BESTBUY.COM, LLC has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.bestbuy.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated

with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 111:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 111 and, therefore, denies the same.

112. On information and belief, since becoming aware of the ‘111 patent, BESTBUY.COM, LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.bestbuy.com for use by BESTBUY.COM, LLC’s clients. BESTBUY.COM, LLC is a direct and indirect infringer, and its clients using www.bestbuy.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 112:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 112 and, therefore, denies the same.

113. On information and belief, since becoming aware of the ‘111 patent BESTBUY.COM, LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BESTBUY.COM, LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BESTBUY.COM, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 113:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 113 and, therefore, denies the same.

114. Defendant BESTBUY.COM, LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 114:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 114 and, therefore, denies the same.

115. On information and belief, Defendant BLOOMINGDALE’S, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.bloomingtondales.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 115:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 115 and, therefore, denies the same.

116. On information and belief, since becoming aware of the ‘111 patent, BLOOMINGDALE’S, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.bloomingtondales.com for use by BLOOMINGDALE’S, INC.’s clients. BLOOMINGDALE’S, INC. is a direct and indirect infringer, and its clients using www.bloomingtondales.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 116:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 116 and, therefore, denies the same.

117. On information and belief, since becoming aware of the ‘111 patent BLOOMINGDALE’S, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BLOOMINGDALE’S, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BLOOMINGDALE’S, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for

infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 117:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 117 and, therefore, denies the same.

118. Defendant BLOOMINGDALE’S, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 118:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 118 and, therefore, denies the same.

119. On information and belief, Defendant BRIGGS & STRATTON CORPORATION has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.homegeneratorsystems.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 119:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 119 and, therefore, denies the same.

120. On information and belief, since becoming aware of the ‘111 patent, BRIGGS & STRATTON CORPORATION has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.homegeneratorsystems.com for use by BRIGGS & STRATTON CORPORATION’s clients. BRIGGS & STRATTON CORPORATION is a direct and indirect infringer, and its clients using www.homegeneratorsystems.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 120:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 120 and, therefore, denies the same.

121. On information and belief, since becoming aware of the ‘111 patent BRIGGS & STRATTON CORPORATION is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BRIGGS & STRATTON CORPORATION knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BRIGGS & STRATTON CORPORATION is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 121:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 121 and, therefore, denies the same.

122. Defendant BRIGGS & STRATTON CORPORATION is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 122:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 122 and, therefore, denies the same.

123. On information and belief, Defendant BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.homegeneratorsystems.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 123:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 123 and, therefore, denies the same.

124. On information and belief, since becoming aware of the ‘111 patent, BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.homegeneratorsystems.com for use by BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC’s clients. BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC is a direct and indirect infringer, and its clients using www.homegeneratorsystems.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 124:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 124 and, therefore, denies the same.

125. On information and belief, since becoming aware of the ‘111 patent BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 125:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 125 and, therefore, denies the same.

126. Defendant BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 126:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 126 and, therefore, denies the same.

127. On information and belief, Defendant BRUNSWICK BILLIARDS, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.brunswickbilliards.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 127:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 127 and, therefore, denies the same.

128. On information and belief, since becoming aware of the ‘111 patent, BRUNSWICK BILLIARDS, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.brunswickbilliards.com for use by BRUNSWICK BILLIARDS, INC.’s clients. BRUNSWICK BILLARDS, INC. is a direct and indirect infringer, and its clients using www.brunswickbilliards.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 128:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 128 and, therefore, denies the same.

129. On information and belief, since becoming aware of the ‘111 patent BRUNSWICK BILLIARDS, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BRUNSWICK BILLIARDS, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BRUNSWICK BILLIARDS, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and

adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 129:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 129 and, therefore, denies the same.

130. Defendant BRUNSWICK BILLIARDS, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 130:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 130 and, therefore, denies the same.

131. On information and belief, Defendant BRUNSWICK CORPORATION has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.brunswickbilliards.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 131:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 131 and, therefore, denies the same.

132. On information and belief, since becoming aware of the ‘111 patent, BRUNSWICK CORPORATION has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.brunswickbilliards.com for use by BRUNSWICK CORPORATION’s clients. BRUNSWICK CORPORATION is a direct and indirect infringer, and its clients using www.brunswickbilliards.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 132:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 132 and, therefore, denies the same.

133. On information and belief, since becoming aware of the ‘111 patent BRUNSWICK CORPORATION is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, BRUNSWICK CORPORATION knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, BRUNSWICK CORPORATION is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 133:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 133 and, therefore, denies the same.

134. Defendant BRUNSWICK CORPORATION is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 134:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 134 and, therefore, denies the same.

135. On information and belief, Defendant CHICO’S RETAIL SERVICES, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.chicos.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 135:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 135 and, therefore, denies the same.

136. On information and belief, since becoming aware of the ‘111 patent, CHICO’S RETAIL SERVICES, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.chicos.com for use by CHICO’S RETAIL SERVICES, INC.’s clients. CHICO’S RETAIL SERVICES is a direct and indirect infringer, and its clients using www.chicos.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 136:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 136 and, therefore, denies the same.

137. On information and belief, since becoming aware of the ‘111 patent CHICO’S RETAIL SERVICES, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, CHICO’S RETAIL SERVICES, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, CHICO’S RETAIL SERVICES, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 137:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 137 and, therefore, denies the same.

138. Defendant CHICO’S RETAIL SERVICES, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 138:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 138 and, therefore, denies the same.

139. On information and belief, Defendant CITIZEN WATCH COMPANY OF AMERICA, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.citizenwatch.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 139:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 139 and, therefore, denies the same.

140. On information and belief, since becoming aware of the '111 patent, CITIZEN WATCH COMPANY OF AMERICA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.citizenwatch.com for use by CITIZEN WATCH COMPANY OF AMERICA, INC.'s clients. CITIZEN WATCH COMPANY OF AMERICA, INC. is a direct and indirect infringer, and its clients using www.citizenwatch.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 140:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 140 and, therefore, denies the same.

141. On information and belief, since becoming aware of the '111 patent CITIZEN WATCH COMPANY OF AMERICA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, CITIZEN WATCH COMPANY OF AMERICA, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, CITIZEN WATCH COMPANY OF AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 141:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 141 and, therefore, denies the same.

142. Defendant CITIZEN WATCH COMPANY OF AMERICA, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 142:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 142 and, therefore, denies the same.

143. On information and belief, Defendant DILLARD'S, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.dillards.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 143:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 143 and, therefore, denies the same.

144. On information and belief, since becoming aware of the '111 patent, DILLARD'S, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.dillards.com for use by DILLARD'S INC.'s clients. DILLARD'S, INC. is a direct and indirect infringer, and its clients using www.dillards.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 144:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 144 and, therefore, denies the same.

145. On information and belief, since becoming aware of the ‘111 patent DILLARD’S, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, DILLARD’S, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, DILLARD’S, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 145:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 145 and, therefore, denies the same.

146. Defendant DILLARD’S, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 146:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 146 and, therefore, denies the same.

147. On information and belief, Defendant EASTMAN KODAK COMPANY has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.kodakgallery.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 147:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 147 and, therefore, denies the same.

148. On information and belief, since becoming aware of the ‘111 patent, EASTMAN KODAK COMPANY has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in

this judicial district, and elsewhere in the United States, by providing the website www.kodakgallery.com for use by EASTMAN KODAK COMPANY's clients. EASTMAN KODAK COMPANY is a direct and indirect infringer, and its clients using www.kodakgallery.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 148:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 148 and, therefore, denies the same.

149. On information and belief, since becoming aware of the '111 patent EASTMAN KODAK COMPANY is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, EASTMAN KODAK COMPANY knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, EASTMAN KODAK COMPANY is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 149:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 149 and, therefore, denies the same.

150. Defendant EASTMAN KODAK COMPANY is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 150:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 150 and, therefore, denies the same.

151. On information and belief, Defendant GENERAL MOTORS LLC has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.cadillac.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated

with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 151:

General Motors LLC denies the allegations in Paragraph 151.

152. On information and belief, since becoming aware of the ‘111 patent, GENERAL MOTORS LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.cadillac.com for use by GENERAL MOTORS LLC’s clients. GENERAL MOTORS LLC is a direct and indirect infringer, and its clients using www.cadillac.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 152:

General Motors LLC denies the allegations in Paragraph 152.

153. On information and belief, since becoming aware of the ‘111 patent GENERAL MOTORS LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its client and by aiding and abetting its use. On information and belief, GENERAL MOTORS LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, GENERAL MOTORS LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 153:

General Motors LLC denies the allegations in Paragraph 153.

154. Defendant GENERAL MOTORS LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 154:

General Motors LLC denies the allegations in Paragraph 154.

155. On information and belief, Defendant THE GILLETTE COMPANY has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.gillette.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable

applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 155:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 155 and, therefore, denies the same.

156. On information and belief, since becoming aware of the ‘111 patent, THE GILLETTE COMPANY has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.gillette.com for use by THE GILLETTE COMPANY’s clients. THE GILLETTE COMPANY is a direct and indirect infringer, and its clients using www.gillette.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 156:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 156 and, therefore, denies the same.

157. On information and belief, since becoming aware of the ‘111 patent THE GILLETTE COMPANY is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, THE GILLETTE COMPANY knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, THE GILLETTE COMPANY is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 157:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 157 and, therefore, denies the same.

158. Defendant THE GILLETTE COMPANY is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 158:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 158 and, therefore, denies the same.

159. On information and belief, Defendant THE GOODYEAR TIRE & RUBBER COMPANY has been and now is infringing at least claim 1 or the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.goodyearotr.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 159:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 159 and, therefore, denies the same.

160. On information and belief, since becoming aware of the ‘111 patent, THE GOODYEAR TIRE & RUBBER COMPANY has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.goodyearotr.com for use by THE GOODYEAR TIRE & RUBBER COMPANY’s clients. THE GOODYEAR TIRE & RUBBER COMPANY is a direct and indirect infringer, and its clients using www.goodyearotr.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 160:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 160 and, therefore, denies the same.

161. On information and belief, since becoming aware of the ‘111 patent THE GOODYEAR TIRE & RUBBER COMPANY is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, THE GOODYEAR TIRE & RUBBER COMPANY knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, THE GOODYEAR TIRE & RUBBER COMPANY is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the

invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 161:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 161 and, therefore, denies the same.

162. Defendant THE GOODYEAR TIRE & RUBBER COMPANY is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 162:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 162 and, therefore, denies the same.

163. On information and belief, Defendant H-D MICHIGAN, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.harley-davidson.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 163:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 163 and, therefore, denies the same.

164. On information and belief, since becoming aware of the ‘111 patent, H-D MICHIGAN, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.harley-davidson.com for use by H-D MICHIGAN, INC.’s clients. H-D MICHIGAN, INC. is a direct and indirect infringer, and its clients using www.harley-davidson.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 164:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 164 and, therefore, denies the same.

165. On information and belief, since becoming aware of the ‘111 patent H-D MICHIGAN, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, H-D MICHIGAN, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, H-D MICHIGAN, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 165:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 165 and, therefore, denies the same.

166. Defendant H-D MICHIGAN, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 166:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 166 and, therefore, denies the same.

167. On information and belief, Defendant HARLEY-DAVIDSON, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.harley-davidson.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 167:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 167 and, therefore, denies the same.

168. On information and belief, since becoming aware of the ‘111 patent, HARLEY-DAVIDSON, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.harley-davidson.com for use by HARLEY-DAVIDSON, INC.’s clients. HARLEY-DAVIDSON, INC. is a direct and indirect infringer, and its clients using www.harley-davidson.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 168:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 168 and, therefore, denies the same.

169. On information and belief, since becoming aware of the ‘111 patent HARLEY-DAVIDSON, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, HARLEY-DAVIDSON, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, HARLEY-DAVIDSON, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 169:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 169 and, therefore, denies the same.

170. Defendant HARLEY-DAVIDSON, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 170:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 170 and, therefore, denies the same.

171. On information and belief, Defendant HASBRO, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.hasbro.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 171:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 171 and, therefore, denies the same.

172. On information and belief, since becoming aware of the ‘111 patent, HASBRO, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.hasbro.com for use by HASBRO, INC.’s clients. HASBRO, INC. is a direct and indirect infringer, and its clients using www.hasbro.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 172:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 172 and, therefore, denies the same.

173. On information and belief, since becoming aware of the ‘111 patent HASBRO, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, HASBRO, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, HASBRO, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 173:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 173 and, therefore, denies the same.

174. Defendant HASBRO, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 174:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 174 and, therefore, denies the same.

175. On information and belief, Defendant HAYNEEDLE, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.bedsidetables.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 175:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 175 and, therefore, denies the same.

176. On information and belief, since becoming aware of the ‘111 patent, HAYNEEDLE, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.bedsidetables.com for use by HAYNEEDLE, INC.’s clients. HAYNEEDLE, INC. is a direct and indirect infringer, and its clients using www.bedsidetables.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 176:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 176 and, therefore, denies the same.

177. On information and belief, since becoming aware of the ‘111 patent HAYNEEDLE, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, HAYNEEDLE, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, HAYNEEDLE, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a

material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 177:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 177 and, therefore, denies the same.

178. Defendant HAYNEEDLE, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 178:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 178 and, therefore, denies the same.

179. On information and belief, Defendant HERMAN MILLER, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.hermanmiller.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 179:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 179 and, therefore, denies the same.

180. On information and belief, since becoming aware of the ‘111 patent, HERMAN MILLER, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.hermanmiller.com for use by HERMAN MILLER, INC.’s clients. HERMAN MILLER, INC. is a direct and indirect infringer, and its clients using www.hermanmiller.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 180:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 180 and, therefore, denies the same.

181. On information and belief, since becoming aware of the ‘111 patent HERMAN MILLER, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, HERMAN MILLER, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, HERMAN MILLER, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 181:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 181 and, therefore, denies the same.

182. Defendant HERMAN MILLER, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 182:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 182 and, therefore, denies the same.

183. On information and belief, Defendant HSN INTERACTIVE LLC has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.hsn.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 183:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 183 and, therefore, denies the same.

184. On information and belief, since becoming aware of the ‘111 patent, HSN INTERACTIVE LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.hsn.com for use by HSN INTERACTIVE LLC’s clients. HSN INTERACTIVE LLC is a direct and indirect infringer, and its clients using www.hsn.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 184:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 184 and, therefore, denies the same.

185. On information and belief, since becoming aware of the ‘111 patent HSN INTERACTIVE LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, HSN INTERACTIVE LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, HSN INTERACTIVE LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 185:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 185 and, therefore, denies the same.

186. Defendant HSN INTERACTIVE LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 186:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 186 and, therefore, denies the same.

187. On information and belief, Defendant HSN LP has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.hsn.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 187:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 187 and, therefore, denies the same.

188. On information and belief, since becoming aware of the '111 patent, HSN LP has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.hsn.com for use by HSN LP's clients. HSN LP is a direct and indirect infringer, and its clients using www.hsn.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 188:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 188 and, therefore, denies the same.

189. On information and belief, since becoming aware of the '111 patent HSN LP is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, HSN LP knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, HSN LP is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 189:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 189 and, therefore, denies the same.

190. Defendant HSN LP is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 190:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 190 and, therefore, denies the same.

191. On information and belief, Defendant THE J. JILL GROUP, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.jjill.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 191:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 191 and, therefore, denies the same.

192. On information and belief, since becoming aware of the ‘111 patent, THE J. JILL GROUP, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.jjill.com for use by THE J. JILL GROUP, INC.’s clients. THE J. JILL GROUP, INC. is a direct and indirect infringer, and its clients using www.jjill.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 192:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 192 and, therefore, denies the same.

193. On information and belief, since becoming aware of the ‘111 patent THE J. JILL GROUP, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, THE J. JILL GROUP, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, THE J. JILL GROUP, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing

that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 193:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 193 and, therefore, denies the same.

194. Defendant THE J. JILL GROUP, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 194:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 194 and, therefore, denies the same.

195. On information and belief, Defendant JILL ACQUISITION LLC has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.jjill.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 195:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 195 and, therefore, denies the same.

196. On information and belief, since becoming aware of the '111 patent, JILL ACQUISITION LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.jjill.com for use by JILL ACQUISITION LLC's clients. JILL ACQUISITION LLC is a direct and indirect infringer, and its clients using www.jjill.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 196:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 196 and, therefore, denies the same.

197. On information and belief, since becoming aware of the ‘111 patent JILL ACQUISITION LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, JILL ACQUISITION LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, JILL ACQUISITION LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 197:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 197 and, therefore, denies the same.

198. Defendant JILL ACQUISITION LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 198:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 198 and, therefore, denies the same.

199. On information and belief, Defendant JONES INVESTMENT COMPANY, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.anneklein.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 199:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 199 and, therefore, denies the same.

200. On information and belief, since becoming aware of the ‘111 patent, JONES INVESTMENT COMPANY, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.anneklein.com for use by JONES INVESTMENT COMPANY, INC.’s clients. JONES INVESTMENT COMPANY, INC. is a direct and indirect infringer, and its clients using www.anneklein.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 200:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 200 and, therefore, denies the same.

201. On information and belief, since becoming aware of the ‘111 patent JONES INVESTMENT COMPANY, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, JONES INVESTMENT COMPANY, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, JONES INVESTMENT COMPANY, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 201:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 201 and, therefore, denies the same.

202. Defendant JONES INVESTMENT COMPANY, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 202:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 202 and, therefore, denies the same.

203. On information and belief, Defendant JONES RETAIL CORPORATION has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.anneklein.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 203:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 203 and, therefore, denies the same.

204. On information and belief, since becoming aware of the ‘111 patent, JONES RETAIL CORPORATION has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.anneklein.com for use by JONES RETAIL CORPORATION’s clients. JONES RETAIL CORPORATION is a direct and indirect infringer, and its clients using www.anneklein.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 204:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 204 and, therefore, denies the same.

205. On information and belief, since becoming aware of the ‘111 patent JONES RETAIL CORPORATION is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, JONES RETAIL CORPORATION knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, JONES RETAIL CORPORATION is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article of commodity or commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 205:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 205 and, therefore, denies the same.

206. Defendant JONES RETAIL CORPORATION is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 206:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 206 and, therefore, denies the same.

207. On information and belief, Defendant KODAK IMAGING NETWORK, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.kodakgallery.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 207:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 207 and, therefore, denies the same.

208. On information and belief, since becoming aware of the '111 patent, KODAK IMAGING NETWORK, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.kodakgallery.com for use by KODAK IMAGING NETWORK, INC.'s clients. KODAK IMAGING NETWORK, INC. is a direct and indirect infringer, and its clients using www.kodakgallery.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 208:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 208 and, therefore, denies the same.

209. On information and belief, since becoming aware of the ‘111 patent KODAK IMAGING NETWORK, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, KODAK IMAGING NETWORK, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, KODAK IMAGING NETWORK, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 209:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 209 and, therefore, denies the same.

210. Defendant KODAK IMAGING NETWORK, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 210:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 210 and, therefore, denies the same.

211. On information and belief, Defendant KOHL’S DEPARTMENT STORES, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.kohls.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 211:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 211 and, therefore, denies the same.

212. On information and belief, since becoming aware of the ‘111 patent, KOHL’S DEPARTMENT STORES, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the

State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.kohls.com for use by KOHL'S DEPARTMENT STORES, INC.'s clients. KOHL'S DEPARTMENT STORES, INC. is a direct and indirect infringer, and its clients using www.kohls.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 212:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 212 and, therefore, denies the same.

213. On information and belief, since becoming aware of the '111 patent KOHL'S DEPARTMENT STORES, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, KOHL'S DEPARTMENT STORES, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, KOHL'S DEPARTMENT STORES, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article of commodity or commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 213:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 213 and, therefore, denies the same.

214. Defendant KOHL'S DEPARTMENT STORES, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 214:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 214 and, therefore, denies the same.

215. On information and belief, Defendant LG ELECTRONICS USA, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.lg.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated

with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 215:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 215 and, therefore, denies the same.

216. On information and belief, since becoming aware of the ‘111 patent, LG ELECTRONICS USA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.lg.com for use by LG ELECTRONICS USA, INC.’s clients. LG ELECTRONICS USA, INC. is a direct and indirect infringer, and its clients using www.lg.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 216:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 216 and, therefore, denies the same.

217. On information and belief, since becoming aware of the ‘111 patent LG ELECTRONICS USA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, LG ELECTRONICS USA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, LG ELECTRONICS USA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity or commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 217:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 217 and, therefore, denies the same.

218. Defendant LG ELECTRONICS USA, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 218:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 218 and, therefore, denies the same.

219. On information and belief, Defendant MACY'S WEST STORES, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.macys.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 219:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 219 and, therefore, denies the same.

220. On information and belief, since becoming aware of the '111 patent, MACY'S WEST STORES, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.macys.com for use by MACY'S WEST STORES, INC.'s clients. MACY'S WEST STORES, INC. is a direct and indirect infringer, and its clients using www.macys.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 220:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 220 and, therefore, denies the same.

221. On information and belief, since becoming aware of the '111 patent MACY'S WEST STORES, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MACY'S WEST STORES, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, MACY'S WEST STORES, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for

infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 221:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 221 and, therefore, denies the same.

222. Defendant MACY’S WEST STORES, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 222:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 222 and, therefore, denies the same.

223. On information and belief, Defendant MACYS.COM, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.macys.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 223:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 223 and, therefore, denies the same.

224. On information and belief, since becoming aware of the ‘111 patent, MACYS.COM, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.macys.com for use by MACYS.COM, INC.’s clients. MACYS.COM, INC. is a direct and indirect infringer, and its clients using www.macys.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 224:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 224 and, therefore, denies the same.

225. On information and belief, since becoming aware of the ‘111 patent MACYS.COM, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MACYS.COM, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, MACYS.COM, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 225:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 225 and, therefore, denies the same.

226. Defendant MACYS.COM, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 226:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 226 and, therefore, denies the same.

227. On information and belief, Defendant MATTEL, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.americangirl.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 227:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 227 and, therefore, denies the same.

228. On information and belief, since becoming aware of the ‘111 patent, MATTEL, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.americangirl.com for use by MATTEL, INC.’s clients. MATTEL, INC. is a direct and indirect infringer, and its clients using www.americangirl.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 228:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 228 and, therefore, denies the same.

229. On information and belief, since becoming aware of the ‘111 patent MATTEL, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MATTEL, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, MATTEL, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its client knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article of commodity or commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 229:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 229 and, therefore, denies the same.

230. Defendant MATTEL, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 230:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 230 and, therefore, denies the same.

231. On information and belief, Defendant MITSUBISHI MOTOR SALES OF AMERICA, INC. has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.mitsubishicars.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 231:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 231 and, therefore, denies the same.

232. On information and belief, since becoming aware of the ‘111 patent, MITSUBISHI MOTOR SALES OF AMERICA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.mitsubishicars.com for use by MITSUBISHI MOTOR SALES OF AMERICA, INC.’s clients. MITSUBISHI MOTOR SALES OF AMERICA, INC. is a direct and indirect infringer, and its clients using www.mitsubishicars.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 232:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 232 and, therefore, denies the same.

233. On information and belief, since becoming aware of the ‘111 patent MITSUBISHI MOTOR SALES OF AMERICA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MITSUBISHI MOTOR SALES OF AMERICA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, MITSUBISHI MOTOR SALES OF AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 233:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 233 and, therefore, denies the same.

234. Defendant MITSUBISHI MOTOR SALES OF AMERICA, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 234:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 234 and, therefore, denies the same.

235. On information and belief, Defendant MITSUBISHI MOTORS NORTH AMERICA, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.mitsubishicars.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 235:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 235 and, therefore, denies the same.

236. On information and belief, since becoming aware of the '111 patent, MITSUBISHI MOTORS NORTH AMERICA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.mitsubishicars.com for use by MITSUBISHI MOTORS NORTH AMERICA, INC.'s clients. MITSUBISHI MOTORS NORTH AMERICA, INC. is a direct and indirect infringer, and its clients using www.mitsubishicars.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 236:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 236 and, therefore, denies the same.

237. On information and belief, since becoming aware of the '111 patent MITSUBISHI MOTORS NORTH AMERICA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MITSUBISHI MOTORS NORTH AMERICA, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, MITSUBISHI MOTORS NORTH AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 237:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 237 and, therefore, denies the same.

238. Defendant MITSUBISHI MOTORS NORTH AMERICA, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 238:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 238 and, therefore, denies the same.

239. On information and belief, Defendant MOTOROLA, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.motorola.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 239:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 239 and, therefore, denies the same.

240. On information and belief, since becoming aware of the '111 patent, MOTOROLA, INC. has been and is now indirectly infringing by way of inducing infringement

and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.motorola.com for use by MOTOROLA, INC.’s clients. MOTOROLA, INC. is a direct and indirect infringer, and its clients using www.motorola.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 240:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 240 and, therefore, denies the same.

241. On information and belief, since becoming aware of the ‘111 patent MOTOROLA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MOTOROLA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, MOTOROLA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 241:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 241 and, therefore, denies the same.

242. Defendant MOTOROLA, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 242:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 242 and, therefore, denies the same.

243. On information and belief, Defendant MOTOROLA TRADEMARK HOLDINGS, LLC has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.motorola.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to

provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 243:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 243 and, therefore, denies the same.

244. On information and belief, since becoming aware of the ‘111 patent, MOTOROLA TRADEMARK HOLDINGS, LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.motorola.com for use by MOTOROLA TRADEMARK HOLDINGS LLC’s clients. MOTOROLA TRADEMARK HOLDINGS, LLC is a direct and indirect infringer, and its clients using www.motorola.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 244:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 244 and, therefore, denies the same.

245. On information and belief, since becoming aware of the ‘111 patent MOTOROLA TRADEMARK HOLDINGS, LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, MOTOROLA TRADEMARK HOLDINGS, LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, MOTOROLA TRADEMARK HOLDINGS, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 245:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 245 and, therefore, denies the same.

246. Defendant MOTOROLA TRADEMARK HOLDINGS, LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 246:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 246 and, therefore, denies the same.

247. On information and belief, Defendant NAUTICA APPAREL, INC. has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.nautica.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 247:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 247 and, therefore, denies the same.

248. On information and belief since becoming aware of the '111 patent, NAUTICA APPAREL, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the 111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.nautica.com for use by NAUTICA APPAREL, INC.'s clients. NAUTICA APPAREL, INC. is a direct and indirect infringer, and its clients using www.nautica.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 248:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 248 and, therefore, denies the same.

249. On information and belief, since becoming aware of the '111 patent NAUTICA APPAREL, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, NAUTICA APPAREL, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, NAUTICA APPAREL, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for

infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 249:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 249 and, therefore, denies the same.

250. Defendant NAUTICAL APPAREL, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 250:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 250 and, therefore, denies the same.

251. On information and belief, Defendant NAUTICA RETAIL USA, INC., has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.nautica.com which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 251:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 251 and, therefore, denies the same.

252. On information and belief since becoming aware of the ‘111 patent, NAUTICA RETAIL USA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.nautica.com for use by NAUTICA RETAIL USA, INC.’s clients. NAUTICA RETAIL USA, INC. is a direct and indirect infringer, and its clients using www.nautica.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 252:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 252 and, therefore, denies the same.

253. On information and belief, since becoming aware of the ‘111 patent NAUTICA RETAIL USA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, NAUTICA RETAIL USA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, NAUTICA RETAIL USA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 253:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 253 and, therefore, denies the same.

254. Defendant NAUTICAL RETAIL USA, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 254:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 254 and, therefore, denies the same.

255. On information and belief, Defendant NAVISTAR, INC., has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.internationaltrucks.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 255:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 255 and, therefore, denies the same.

256. On information and belief since becoming aware of the '111 patent, NAVISTAR, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.internationaltrucks.com for use by NAVISTAR, INC.'s clients. NAVISTAR, INC. is a direct and indirect infringer, and its clients using www.internationaltrucks.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 256:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 256 and, therefore, denies the same.

257. On information and belief, since becoming aware of the '111 patent NAVISTAR, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, NAVISTAR, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, NAVISTAR, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 257:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 257 and, therefore, denies the same.

258. Defendant NAVISTAR, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 258:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 258 and, therefore, denies the same.

259. On information and belief, Defendant NEW BALANCE ATHLETIC SHOE, INC., has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.newbalance.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 259:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 259 and, therefore, denies the same.

260. On information and belief since becoming aware of the '111 patent, NEW BALANCE ATHLETIC SHOE, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.newbalance.com for use by NEW BALANCE ATHLETIC SHOE, INC.'s clients. NEW BALANCE ATHLETIC SHOE, INC. is a direct and indirect infringer, and its clients using www.newbalance.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 260:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 260 and, therefore, denies the same.

261. On information and belief, since becoming aware of the '111 patent NEW BALANCE ATHLETIC SHOE, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, NEW BALANCE ATHLETIC SHOE, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, NEW BALANCE ATHLETIC SHOE, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 261:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 261 and, therefore, denies the same.

262. Defendant NEW BALANCE ATHLETIC SHOE, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 262:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 262 and, therefore, denies the same.

263. On information and belief, Defendant NISSAN NORTH AMERICA, INC., has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.nissanusa.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 263:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 263 and, therefore, denies the same.

264. On information and belief since becoming aware of the '111 patent, NISSAN NORTH AMERICA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.nissanusa.com for use by NISSAN NORTH AMERICA, INC.'s clients. NISSAN NORTH AMERICA, INC. is a direct and indirect infringer, and its clients using www.nissanusa.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 264:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 264 and, therefore, denies the same.

265. On information and belief, since becoming aware of the ‘111 patent NISSAN NORTH AMERICA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, NISSAN NORTH AMERICA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, NISSAN NORTH AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 265:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 265 and, therefore, denies the same.

266. Defendant NISSAN NORTH AMERICA, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 266:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 266 and, therefore, denies the same.

267. On information and belief, Defendant PRL USA HOLDINGS, INC., has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.ralphlauren.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 267:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 267 and, therefore, denies the same.

268. On information and belief since becoming aware of the ‘111 patent, PRL USA HOLDINGS, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in

this judicial district, and elsewhere in the United States, by providing the website www.ralphlauren.com for use by PRL USA HOLDINGS, INC.'s clients. PRL USA HOLDINGS, INC. is a direct and indirect infringer, and its clients using www.ralphlauren.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 268:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 268 and, therefore, denies the same.

269. On information and belief, since becoming aware of the '111 patent PRL USA HOLDINGS, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, PRL USA HOLDINGS, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, PRL USA HOLDINGS, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 269:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 269 and, therefore, denies the same.

270. Defendant PRL USA HOLDINGS, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 270:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 270 and, therefore, denies the same.

271. On information and belief, Defendant THE PROCTER & GAMBLE COMPANY, has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.gillette.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to

provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 271:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 271 and, therefore, denies the same.

272. On information and belief since becoming aware of the '111 patent, THE PROCTER & GAMBLE COMPANY has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.gillette.com for use by THE PROCTER & GAMBLE COMPANY's client. THE PROCTER & GAMBLE COMPANY is a direct and indirect infringer, and its clients using www.gillette.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 272:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 272 and, therefore, denies the same.

273. On information and belief, since becoming aware of the '111 patent THE PROCTER & GAMBLE COMPANY is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, THE PROCTER & GAMBLE COMPANY knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, THE PROCTER & GAMBLE COMPANY is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 273:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 273 and, therefore, denies the same.

274. Defendant THE PROCTER & GAMBLE COMPANY is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 274:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 274 and, therefore, denies the same.

275. On information and belief, Defendant RALPH LAUREN MEDIA LLC, has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.ralphlauren.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 275:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 275 and, therefore, denies the same.

276. On information and belief since becoming aware of the '111 patent, RALPH LAUREN MEDIA LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.ralphlauren.com for use by RALPH LAUREN MEDIA LLC's clients. RALPH LAUREN MEDIA LLC is a direct and indirect infringer, and its clients using www.ralphlauren.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 276:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 276 and, therefore, denies the same.

277. On information and belief, since becoming aware of the '111 patent RALPH LAUREN MEDIA LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, RALPH LAUREN MEDIA LLC knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, RALPH LAUREN MEDIA LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for

infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 277:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 277 and, therefore, denies the same.

278. Defendant RALPH LAUREN MEDIA LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 278:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 278 and, therefore, denies the same.

279. On information and belief, Defendant RUSSELL BRANDS, LLC has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.russellathletic.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 279:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 279 and, therefore, denies the same.

280. On information and belief since becoming aware of the ‘111 patent, RUSSELL BRANDS, LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.russellathletic.com for use by RUSSELL BRANDS, LLC’s clients. RUSSELL BRANDS, LLC is a direct and indirect infringer, and its clients using www.russellathletic.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 280:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 280 and, therefore, denies the same.

281. On information and belief, since becoming aware of the ‘111 patent RUSSALL BRANDS, LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, RUSSELL BRANDS, LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, RUSSELL BRANDS, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 281:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 281 and, therefore, denies the same.

282. Defendant RUSSELL BRANDS, LLC is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 282:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 282 and, therefore, denies the same.

283. On information and belief, Defendant SUBARU OF AMERICA, INC., has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.subaru.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 283:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 283 and, therefore, denies the same.

284. On information and belief since becoming aware of the ‘111 patent, SUBARU OF AMERICA, INC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.subaru.com for use by SUBARU OF AMERICA, INC.’s clients. SUBARU OF AMERICA, INC. is a direct and indirect infringer, and its clients using www.subaru.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 284:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 284 and, therefore, denies the same.

285. On information and belief, since becoming aware of the ‘111 patent SUBARU OF AMERICA, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, SUBARU OF AMERICA, INC. knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, SUBARU OF AMERICA, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 285:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 285 and, therefore, denies the same.

286. Defendant SUBARU OF AMERICA, INC. is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 286:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 286 and, therefore, denies the same.

287. On information and belief, Defendant SUNGLASS HUT TRADING, LLC, has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.sunglasshut.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 287:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 287 and, therefore, denies the same.

288. On information and belief since becoming aware of the ‘111 patent, SUNGLASS HUT TRADING, LLC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.sunglasshut.com for use by SUNGLASS HUT TRADING, LLC’s clients. SUNGLASS HUT TRADING, LLC. is a direct and indirect infringer, and its clients using www.sunglasshut.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 288:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 288 and, therefore, denies the same.

289. On information and belief, since becoming aware of the ‘111 patent SUNGLASS HUT TRADING, LLC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, SUNGLASS HUT TRADING, LLC knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, SUNGLASS HUT TRADING, LLC is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 289:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 289 and, therefore, denies the same.

290. Defendant SUNGLASS HUT TRADING, LLC is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 290:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 290 and, therefore, denies the same.

291. On information and belief, Defendant VICTORIA'S SECRET, has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.victoriassecret.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 291:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 291 and, therefore, denies the same.

292. On information and belief since becoming aware of the '111 patent, VICTORIA'S SECRET has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.victoriassecret.com for use by VICTORIA'S SECRET's clients. VICTORIA'S SECRET. is a direct and indirect infringer, and its clients using www.victoriassecret.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 292:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 292 and, therefore, denies the same.

293. On information and belief, since becoming aware of the ‘111 patent VICTORIA’S SECRET is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, VICTORIA’S SECRET knew or should have known that through its acts it was and is inducing infringement of the ‘111 patent. On information and belief, VICTORIA’S SECRET is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the ‘111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 293:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 293 and, therefore, denies the same.

294. Defendant VICTORIA’S SECRET is thus liable for infringement of the ‘111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 294:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 294 and, therefore, denies the same.

295. On information and belief, Defendant WOLVERINE WORLD WIDE, INC., has been and now is infringing at least claim 1 the ‘111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.catfootwear.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 295:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 295 and, therefore, denies the same.

296. On information and belief since becoming aware of the ‘111 patent, WOLVERINE WORLD WIDE, INC has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the ‘111 patent

in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.catfootwear.com for use by WOLVERINE WORLD WIDE, INC.'s clients. WOLVERINE WORLD WIDE, INC. is a direct and indirect infringer, and its clients using www.catfootwear.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 296:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 296 and, therefore, denies the same.

297. On information and belief, since becoming aware of the '111 patent WOLVERINE WORLD WIDE, INC. is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified website to its clients and by aiding and abetting its use. On information and belief, WOLVERINE WORLD WIDE, INC. knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, WOLVERINE WORLD WIDE, INC. is and has been committing the act of contributory infringement by intending to provide the identified website to its clients knowing that it is a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 297:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 297 and, therefore, denies the same.

298. Defendant WOLVERINE WORLD WIDE, INC. is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 298:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 298 and, therefore, denies the same.

299. On information and belief, Defendant WOMEN'S APPAREL GROUP, LLC., has been and now is infringing at least claim 1 the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by actions comprising making and using its website at www.metrostyle.com, which comprises a server coupled to a communications link that receives a request from a client device and collects data items as a function of the requests; an executable applet dynamically generated by the server in response to the client request; a constituent system associated with the applet comprising a subset of the data items and a further constituent system comprising a data interface capability configured to provide a plurality of

operations associated with the subset of data items; with such applet operable to be transferred over the communications link to the client device.

RESPONSE TO PARAGRAPH NO. 299:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 299 and, therefore, denies the same.

300. On information and belief since becoming aware of the '111 patent, WOMEN'S APPAREL GROUP, LLC. has been and is now indirectly infringing by way of inducing infringement and contributing to the infringement of at least claim 1 of the '111 patent in the State of Texas, in this judicial district, and elsewhere in the United States, by providing the website www.metrostyle.com and www.chadwicks.com for use by WOMEN'S APPAREL GROUP, LLC's clients. WOMEN'S APPAREL GROUP, LLC is a direct and indirect infringer, and its clients using www.metrostyle.com and www.chadwicks.com are direct infringers.

RESPONSE TO PARAGRAPH NO. 300:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 300 and, therefore, denies the same.

301. On information and belief, since becoming aware of the '111 patent WOMEN'S APPAREL GROUP, LLC is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the identified websites to its clients and by aiding and abetting its use. On information and belief, WOMEN'S APPAREL GROUP, LLC knew or should have known that through its acts it was and is inducing infringement of the '111 patent. On information and belief, WOMEN'S APPAREL GROUP, LLC is and has been committing the act of contributory infringement by intending to provide the identified websites to its clients knowing that they are a material part of the invention, knowing that its use was made and adapted for infringement of the '111 patent, and further knowing that the system is not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE TO PARAGRAPH NO. 301:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 301 and, therefore, denies the same.

302. Defendant WOMEN'S APPAREL GROUP, LLC is thus liable for infringement of the '111 patent pursuant to 35 U.S.C. § 271.

RESPONSE TO PARAGRAPH NO. 302:

General Motors LLC lacks sufficient information from which to admit or deny the allegations of Paragraph 302 and, therefore, denies the same.

303. As a result of Defendants' infringing conduct, Defendants should be held liable to Parallel Networks in an amount that adequately compensates Parallel Networks for their infringement, which, by law, can be no less than a reasonable royalty.

RESPONSE TO PARAGRAPH NO. 303:

General Motors LLC denies the allegations in Paragraph 303 as applied to General Motors LLC. General Motors LLC lacks sufficient information to admit or deny the remaining allegations of Paragraph 303 as applied to the other defendants, and therefore, denies the same.

304. On information and belief, Defendants have had at least constructive notice of the '111 patent by operation of law, and there are no marking requirements that have not been complied with.

RESPONSE TO PARAGRAPH NO. 304:

General Motors LLC denies the allegations in Paragraph 304 as applied to General Motors LLC. General Motors LLC lacks sufficient information to admit or deny the remaining allegations of Paragraph 304 as applied to the other defendants, and therefore, denies the same.

COUNT II
WILLFUL INFRINGEMENT

305. On information and belief, prior to the filing of the complaint, Defendants' infringement was willful and continues to be willful. On information and belief, prior to the filing of this Complaint, Defendants were aware of the '111 patent and knew or should have known that Defendants were infringing at least claim 1 of the '111 patent. On information and belief, Defendants in their infringing activities acted as they did despite an objectively high likelihood that their actions constituted infringement of a valid patent. The Defendants' infringing activities were intentional and willful in that the risk of infringement was known to Defendants or was so obvious that it should have been known to Defendants.

RESPONSE TO PARAGRAPH NO. 305:

General Motors LLC denies the allegations in Paragraph 305 as applied to General Motors LLC. General Motors LLC lacks sufficient information to admit or deny the remaining allegations of Paragraph 305 as applied to the other defendants, and therefore, denies the same.

RESPONSE TO PRAYER

To the extent any allegations and/or averments are contained in Parallel Networks' prayer for relief, they are denied.

AFFIRMATIVE DEFENSES

General Motors LLC, pursuant to Fed. R. Civ. P. 8(c) and subject to further investigation and discovery, hereby asserts the following defenses in this matter, affirmative or otherwise and without assuming any burden of proof that it would not otherwise have:

First Affirmative Defense

Plaintiff's Complaint fails to state a claim for which relief can be granted.

Second Affirmative Defense

Venue in this judicial district is improper or inconvenient.

Third Affirmative Defense

General Motors LLC does not directly or indirectly infringe any valid and enforceable claims of U.S. Patent No. 6,446,111 ("the '111 patent").

Fourth Affirmative Defense

Claims of the '111 patent are invalid under one or more provisions of 35 U.S.C. §§ 102, 103 and/or 112.

Fifth Affirmative Defense

Parallel Networks is not entitled to any injunctive relief as it has, at a minimum, an adequate remedy at law and will suffer no irreparable injury.

Sixth Affirmative Defense

Parallel Networks' claims of infringement under the '111 Patent are barred, in whole or in part, by laches.

COUNTERCLAIMS FOR DECLARATORY JUDGMENT

General Motors LLC for its Counterclaims against Parallel Networks, states as follows:

Parties

1. General Motors LLC is a corporation with a principal place of business at 300 Renaissance Center, Detroit, Michigan.

2. Upon information and belief, Parallel Networks is a Texas Limited Liability Company with its place of business at 100 E. Ferguson Street, Suite 602 Tyler, Texas.

Jurisdiction and Venue

3. This Court has federal question subject matter jurisdiction over the counterclaims under 28 U.S.C. §§ 1331, 1338, 2201 and 2202.

4. If venue is proper for Parallel Network's claims, then venue is proper under 28 U.S.C. §§ 1391(c) and 1400(b).

Counterclaim I—Declaration of Noninfringement

5. General Motors LLC incorporates the allegations contained in paragraphs 1-4 as though fully set forth in this paragraph.

6. An actual and justiciable controversy exists between General Motors LLC and Parallel Network regarding the '111 patent.

7. General Motors LLC has not and does not infringe any valid claims of the '111 patent, either literally or under the doctrine of equivalents.

8. General Motors LLC is entitled to a declaratory judgment that it has not and does not infringe the '111 patent.

Counterclaim II—Declaration of Invalidity

9. General Motors LLC incorporates the allegations contained in paragraphs 1-8 as though fully set forth in this paragraph.

10. Claims of the '111 patent are invalid under one or more provisions of 35 U.S.C. §§ 102, 103 and/or 112.

11. General Motors LLC is entitled to a declaration that claims of the '111 patent are invalid.

DEMAND FOR JURY TRIAL

In accordance with Rule 38 of the Federal Rules of Civil Procedure and Local Rule CV-38, General Motors LLC respectfully demands a jury trial of all issues triable to a jury in this action.

REQUEST FOR RELIEF

WHEREFORE, General Motors LLC respectfully requests that this Court enter a Judgment and Order in its favor and against Parallel Network as follows:

- (a) declaring that claims of U.S. Patent No. 6,446,111 are invalid;
- (b) declaring that General Motors LLC has not infringed and does not infringe U.S. Patent No. 6,446,111;
- (c) declaring that this is an exceptional case under 35 U.S.C. § 285 and awarding General Motors LLC its attorneys' fees, costs, and expenses in this action; and
- (d) awarding General Motors LLC any further and additional relief as the Court deems just and proper.

Dated: November 8, 2010

Respectfully submitted,

By: /s/ Marina N. Saito, with permission by
Michael E. Jones

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ATTORNEYS FOR DEFENDANT
GENERAL MOTORS LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record who have consented to electronic service by e-mail in compliance with Local Rule CV-5(a) on this the 8th day of November, 2010 pursuant to the Court's CM/ECF system. Any other counsel of record will be served via First Class U.S. Mail on this same date.

/s/ Michael E. Jones