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

PARALLEL NETWORKS, LLC, Plaintiff, v. ADIDAS AMERICA, INC.; ADIDAS INTERACTIVE, INC.; AEROPOSTALE, INC.; AMERICAN GIRL, LLC; AMERICAN SUZUKI MOTOR CORPORATION; ANDERSEN CORPORATION; ANDERSEN WINDOWS, INC.; ASICS AMERICA CORPORATION; AT&T INC.; BBY SOLUTIONS, INC.; BERGDORFGOODMAN.COM, LLC; BESTBUY.COM, LLC; BLOOMINGDALE'S, INC.; BRIGGS & STRATTON CORPORATION; BRIGGS & STRATTON POWER PRODUCTS GROUP, LLC; BRUNSWICK BILLIARDS, INC.; BRUNSWICK CORPORATION; CHICO'S RETAIL SERVICES, INC.; CITIZEN WATCH COMPANY OF AMERICA, INC.; DILLARD'S, INC.; EASTMAN KODAK COMPANY; GENERAL MOTORS LLC; THE GILLETTE COMPANY; THE GOODYEAR TIRE & RUBBER COMPANY; H-D MICHIGAN, INC.; HARLEY-DAVIDSON, INC.; HASBRO, INC.; HAYNEEDLE, INC.; HERMAN MILLER, INC.; HSN INTERACTIVE LLC; HSN LP; THE J. JILL GROUP, INC.; JILL ACQUISITION LLC; JONES INVESTMENT COMPANY, INC.; JONES RETAIL CORPORATION; KODAK IMAGING NETWORK, INC.; KOHL'S DEPARTMENT STORES, INC.; LG ELECTRONICS USA, INC.; MACY'S WEST STORES, INC.; MACYS.COM, INC.; MATTEL, INC.; MITSUBISHI MOTOR SALES OF AMERICA, INC.; MITSUBISHI MOTORS NORTH AMERICA, INC.;	)	Civil Action No. 6:10-cv-491-LED

MOTOROLA, INC.; MOTOROLA TRADEMARK HOLDINGS, LLC; NAUTICA APPAREL, INC.; NAUTICA RETAIL USA, INC.; NAVISTAR, INC.; NEW BALANCE ATHLETIC SHOE, INC.; NISSAN NORTH AMERICA, INC.; PRL USA HOLDINGS, INC.; THE PROCTER & GAMBLE COMPANY; RALPH LAUREN MEDIA LLC; RUSSELL BRANDS, LLC; SUBARU OF AMERICA, INC.; SUNGLASS HUT TRADING, LLC; VICTORIA'S SECRET; WOLVERINE WORLD WIDE, INC.; and WOMEN'S APPAREL GROUP, LLC d/b/a BOSTON APPAREL GROUP, LLC

Defendants.

LG ELECTRONICS USA, INC.'S ANSWER, AFFIRMATIVE DEFENSES, AND COUNTERCLAIMS TO PARALLEL NETWORKS, LLC'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Defendant LG Electronics USA, Inc. ("LGE") responds to the Original Complaint for Patent Infringement ("Complaint") filed by Plaintiff Parallel Networks, LLC ("Parallel Networks") 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 24 and therefore denies the same.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 28 and therefore denies the same.

29. On information and belief, Defendant HASBRO, INC., is a corporation with a place of business in Pawtucket, Rhode Island.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 Bristol, Pennsylvania.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

Admitted.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 55 and therefore denies the same.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 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:

LGE admits that the Complaint purports to state a cause of action arising under Title 35 of the United States Code, and that 28 U.S.C. §§ 1331 and 1338(a) grant district courts with original jurisdiction over civil actions arising under that Act. LGE denies that it has engaged in any infringing acts in this district or elsewhere and denies that it is subject to the specific and general jurisdiction of this Court pursuant to due process and/or the Texas Long Arm Statute based on its business activities in this forum, and specifically objects to Plaintiff's conclusory statements regarding those business activities. LGE admits its website is or was accessible in this District and to residents of Texas generally, but was not necessarily directed purposely or solely at this District or the residents of Texas, and further denies the remaining allegations of this paragraph to the extent such allegations apply to LGE. As to the allegations of this paragraph that apply to any other Defendants, LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of such allegations 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 web sites accessible from this District.

RESPONSE:

LGE denies that the Eastern District of Texas is the most convenient venue for adjudication of the claims raised by Plaintiff in this action and reserves the right to move to transfer to a more convenient or appropriate venue pursuant to 28 U.S.C. § 1404. LGE denies that it has committed, contributed to, and/or induced any acts of infringement in this District or elsewhere. To the extent the remaining allegations of this paragraph are directed at LGE, they are denied. To the extent the allegations of this paragraph are directed to other entities, LGE lacks sufficient information to admit or deny said allegations and therefore denies them. LGE further avers that Plaintiff's joinder of multiple, unrelated Defendants into this single action is improper in that the claims asserted by Plaintiff in this Complaint do not arise out of the same transaction or occurrence or series of transactions or occurrence as required by the Federal Rules and is prejudicial to LGE.

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:

Without admitting that the patent is properly issued or titled, LGE admits that the first page of U.S. Patent No. 6,446,111 ("the '111 patent") indicates that the patent was issued on September 3, 2002 and that the patent is entitled "Method and Apparatus for Client-Server Communication Using a Limited Capability Client Over a Low-Speed Communications Link."

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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in this paragraph and therefore denies the same.

66. At least one claim of the ‘111 patent 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:

Denied.

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.corn, 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 clients 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 INTERACTIVE, 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 of 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 of 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 of 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 III 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 of 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 or commodity of commerce suitable for substantially noninfringing use.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 or commodity of commerce suitable for substantially noninfringing use.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 109 and therefore denies the same.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.bloomingdales.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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.bloomingdales.com for use by BLOOMINGDALE’S, INC.’s clients.

BLOOMINGDALE'S, INC. is a direct and indirect infringer, and its clients using www.bloomingdales.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 BILLIARDS, INC. is a direct and indirect infringer, and its clients using www.brunswickbilliards.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 RETAILSERVICES, INC.'s clients. CHICO'S RETAIL SERVICES, INC. is a direct and indirect infringer, and its clients using www.chicos.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

GE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 1of 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 151 and therefore denies the same.

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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 152 and therefore denies the same.

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 clients 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 153 and therefore denies the same.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 154 and therefore denies the same.

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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.corn are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.harleydavidson.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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, HARLEYDAVIDSON, 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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. § 27l.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 or commodity of commerce suitable for substantially noninfringing use.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 or commodity of commerce suitable for substantially noninfringing use.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

Denied.

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:

Denied.

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 of commerce suitable for substantially noninfringing use.

RESPONSE:

Denied.

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

RESPONSE:

Denied.

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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.corn, 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.corn, 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.corn, 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 249 and therefore denies the same.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 253 and therefore denies the same.

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

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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.intemationaltrucks.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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 254 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.intemationaltrucks.com for use by NAVISTAR, INC.’s clients. NAVISTAR, INC. is a direct and indirect infringer, and its clients using www.intemationaltrucks.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 clients. THE PROCTER & GAMBLE COMPANY is a direct and indirect infringer, and its clients using www.gillette.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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. § 27l.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in paragraph 280 and therefore denies the same.

281. On information and belief, since becoming aware of the ‘111 patent RUSSELL 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 web sites at www.metrostyle.com and www.chadwicks.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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 websites 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 or www.chadwicks.com are direct infringers.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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 web sites 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 web sites 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 systems are not a staple article or commodity of commerce suitable for substantially noninfringing use.

RESPONSE:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the allegations in 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:

LGE denies the allegations of paragraph 303 to the extent such allegations apply to LGE. LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in paragraph 303, and therefore LGE denies all such allegations.

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:

LGE denies the allegations of paragraph 304 to the extent such allegations apply to LGE. LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in paragraph 304, and therefore LGE denies all such allegations.

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:

LGE denies the allegations of paragraph 305 to the extent such allegations apply to LGE. LGE lacks knowledge or information sufficient to form a belief as to the truth or accuracy of the remaining allegations in paragraph 305, and therefore LGE denies all such allegations.

RESPONSE TO PARALLEL NETWORKS' PRAYER FOR RELIEF

LGE denies that Plaintiff is entitled to a judgment or order against LGE and further denies that Plaintiff is entitled to any aspect of the requested relief to the extent such relief is sought against LGE. LGE avers that the Court should declare the case exceptional and award LGE reasonable attorneys' fees pursuant to 35 U.S.C. § 285, together with its costs and interest to the extent permitted by law.

To the extent that any allegations of the Complaint have not been previously specifically admitted or denied, LGE denies them.

AFFIRMATIVE DEFENSES

Without assuming any burden that it would not otherwise have, LGE asserts the following affirmative defenses. LGE reserves the right to amend its answer with additional defenses, including the defense of unenforceability of the asserted patent due to inequitable conduct during prosecution of the patent, as further information is obtained.

FIRST AFFIRMATIVE DEFENSE

1. Noninfringement. LGE has not infringed, contributed to the infringement of, or induced the infringement of any valid claim of the ’111 patent either directly or indirectly, literally or under the doctrine of equivalents.

SECOND AFFIRMATIVE DEFENSE

2. Invalidity. At least one or more of the claims of the ’111 patent are invalid because they fail to satisfy one or more of the conditions for patentability specified in Title 35 of the United States Code, including, without limitation, §§ 101, 102, 103, and/or 112.

THIRD AFFIRMATIVE DEFENSE

3. Estoppel. Parallel Networks is estopped in view of the prior art and/or by virtue of amendments, representations, and/or concessions made to the United States Patent and Trademark Office during prosecution of the application for the ’111 patent, from construing any claim to be infringed or to have been infringed by LGE.

FOURTH AFFIRMATIVE DEFENSE

4. Limited Relief. Parallel Networks’ claims for relief are statutorily limited in whole or in part by Title 35 of the United States Code, including without limitation, 35 U.S.C. §§ 286 and/or 287.

FIFTH AFFIRMATIVE DEFENSE

5. Laches. Parallel Networks' claims for damages and other relief are barred in whole or in part by the equitable doctrine of laches, including but not limited to Parallel Networks' unreasonable delay in asserting the '111 patent.

SIXTH AFFIRMATIVE DEFENSE

6. Failure to State a Claim. The Complaint and each and every purported claim for relief therein fail to allege facts sufficient to state a claim against LGE.

SEVENTH AFFIRMATIVE DEFENSE

7. No Injunctive Relief. Parallel Networks' claims for injunctive relief are barred because there exist adequate remedies at law and because Parallel Networks' claims otherwise fail to meet the requirements for such relief.

EIGHTH AFFIRMATIVE DEFENSE

8. Impermissible joinder of defendants. Plaintiff's joinder of multiple, unrelated defendants into this single action is improper under Rule 20 of the Federal Rules of Civil Procedure in that the claims asserted by Plaintiff in this Complaint do not arise out of the same transaction or occurrence or series of transactions or occurrence as required by the Federal Rules, and is prejudicial to LGE.

COUNTERCLAIMS

LGE pleads the following counterclaims against Parallel Networks:

THE PARTIES

1. LGE is a Delaware corporation with its headquarters at 1000 Sylvan Avenue, Englewood Cliffs, NJ 07632, and is a wholly owned subsidiary of LG Electronics, Inc., which is

a Korean corporation with its headquarters at LG Twin Towers 20, Yeouido-dong, Yeongdeungpo-gu, Seoul, Korea, 150-721.

2. Based on the allegations contained in the Complaint, Parallel Networks has stated that it is a Texas Limited Liability Company with its place of business in Tyler, Texas.

JURISDICTION AND VENUE

3. This is a claim for Declaratory Judgment pursuant to 28 U.S.C. § 2201, which arises from an actual and existing controversy between LGE and Parallel Networks.

4. This claim arises under the laws of the United States relating to patents, Title 35 of the United States Code. This Court has jurisdiction under 28 U.S.C. § 1338(a).

5. Parallel Networks has consented to the personal jurisdiction of this Court at least by commencing its action for patent infringement in this District, as set forth in its Complaint.

6. To the extent the underlying action brought by Parallel Networks against LGE proceeds in this District, venue is proper in this District because the facts and circumstances alleged in the counterclaims are related to the facts and circumstances alleged in the Complaint filed by Parallel Networks.

COUNT I—DECLARATORY JUDGMENT OF NON-INFRINGEMENT

7. LGE incorporates and realleges paragraphs 1-6 of its Counterclaims as if fully stated herein.

8. Based on Parallel Networks' filing of this action and at least LGE's First Affirmative Defense, an actual controversy has arisen and now exists between the parties as to whether or not LGE has infringed the '111 patent.

9. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., LGE requests a declaration by the Court that LGE has not infringed, and does not infringe, any valid

claim of the ’111 patent, whether directly, indirectly, individually, jointly, contributorily, and/or by inducement.

COUNT II—DECLARATORY JUDGMENT OF INVALIDITY

10. LGE incorporates and realleges paragraphs 1-9 of its Counterclaims as if fully stated herein.

11. Based on Parallel Networks’ filing of this action and at least LGE’s Second Affirmative Defense, an actual controversy has arisen and now exists between the parties as to the validity of the claims of the ’111 patent.

12. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. §2201 et seq., and Title 35 of the United States Code, LGE requests a declaration by the Court that each claim of the ’111 patent is invalid for failing to satisfy the conditions for patentability specified in 35 U.S.C. § 101 et seq., including, without limitation, §§ 101, 102, 103, and/or 112.

COUNT III—DECLARATORY JUDGMENT OF UNENFORCEABILITY

13. LGE incorporates and realleges paragraphs 1-12 of its Counterclaims as if fully stated herein.

14. Based on Parallel Networks’ filing of this action and at least LGE’s Third, Fourth and Fifth Affirmative Defenses, an actual controversy has arisen and now exists between the parties as to the enforceability of the ’111 patent.

15. Pursuant to the Federal Declaratory Judgment Act, 28 U.S.C. §2201 et seq., LGE requests a declaration by the Court that the claims of the ’111 patent are unenforceable.

PRAYER FOR RELIEF

WHEREFORE, LGE respectfully requests that this Court enter judgment in LGE's favor against Parallel Networks and issue an order that includes:

A. A declaration that LGE has not and does not infringe, either directly, indirectly, or otherwise, any valid and enforceable claim of the '111 patent;

B. A declaration that the claims of the '111 patent are invalid;

C. A declaration that the '111 patent is unenforceable;

D. A permanent injunction preventing Parallel Networks, including its officers, agents, employees, and all persons acting in concert or participation with Parallel Networks, from charging that the '111 patent is infringed by LGE:

E. A declaration that Parallel Networks take nothing by its Complaint;

F. Denial of Parallel Networks' request for injunctive relief;

G. Dismissal of Parallel Networks' Complaint with prejudice;

H. A judgment that this is an exceptional case under 35 U.S.C. § 285 and awarding LGE its costs, expenses, disbursements and reasonable attorneys' fees, together with interest, including prejudgment interest; and

I. Such other relief as this Court deems just and proper.

Dated: November 29, 2010

Respectfully Submitted,

/s/ Steven Lieberman
(with permission by Jennifer P. Ainsworth)

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ATTORNEYS FOR DEFENDANT
LG ELECTRONICS U.S.A., INC.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3), on this the 29th day of November, 2010.

*/s/ Jennifer P. Ainsworth*_____
Jennifer P. Ainsworth