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**IN THE UNITED STATES DISTRICT COURT
 DISTRICT OF UTAH, CENTRAL DIVISION**

<p>PUBLIC ENGINES, INC., a Delaware corporation,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>REPORTSEE, INC., a Delaware corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>ANSWER, AND DEFENSES AND JURY DEMAND OF DEFENDANT REPORTSEE, INC.</p> <p>Case No. 2:10-cv-317</p> <p>Judge Tena Campbell</p>
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Defendant ReportSee, Inc., by and through its undersigned counsel, herewith answers the Complaint, provides its defenses and makes its jury demand. The paragraph numbers in the answer section correspond to the paragraph numbers in the Complaint. Any allegation not specifically admitted is denied.

1. Admitted.

2. Admitted.

3. This paragraph states a legal conclusion to which no response is required except as to the last sentence. To the extent that a response is required, the allegations are denied.

4. This paragraph states a legal conclusion to which no response is required except as to the last sentence. To the extent that a response is required, the allegations are denied.

5. Admit first sentence. Admit second sentence, except deny suite is comprehensive and “near real time.” Admit third sentence, except without sufficient information to admit or deny that software is proprietary or that reports are limited. Deny fourth sentence. Deny fifth sentence. Defendant is without sufficient information to respond to the allegations in the sixth and seventh sentences.

6. Admit the first sentence, except deny “though not in conjunction with law enforcement agencies. Admit second sentence. Deny third sentence. Defendant is without sufficient information to respond to the allegations in the fourth sentence. Deny the fifth sentence. With respect to sixth sentence, Defendant admits a letter was sent and denies the characterization of the letter as the letter speaks for itself.

7. With respect to first sentence, admit to using an automated scraper, deny the remaining allegations. With respect to the second sentence, admit that Defendant used a computer which was identified only by an IP address and deny the remaining allegations. Defendant is without sufficient information to respond to the allegations in the third sentence. Admit fourth sentence. Deny the fifth sentence.

8. Admit the first sentence, except deny “demanded.” Deny the second and third sentences.

9. The first sentence is a legal conclusion for which no response is required. The second sentence is denied. The remainder of the paragraph states legal conclusions to which no response is required.

10. Admit first sentence. Admit second sentence. With respect to the third sentence, admit as to some systems and agencies and deny as to other systems and agencies.

11. Admit the first and second sentences. With respect to the third sentence, admit as to some systems and agencies and deny as to other systems and agencies.

12. Defendant is without sufficient information to respond to the allegations in this paragraph.

13. Defendant is without sufficient information to respond to the allegations in the first sentence. Deny the second and third sentences.

14. Defendant is without sufficient information to respond to the allegations in the first, second and third sentence. Deny first sentence. Admit second sentence, except deny characterization as “user friendly.”

15. Defendant is without sufficient information to respond to the allegations in paragraph 15.

16. Defendant is without sufficient information to respond to the allegations.

17. Defendant is without sufficient information to respond to the allegations.

18. Defendant is without sufficient information to respond to the allegations in the first, second and third sentences. Deny the fourth sentence. The fifth sentence is a legal conclusion for which no response is required. Deny the sixth sentence. The seventh sentence is a legal conclusion for which no response is required. Deny the eighth sentence and Defendant avers that on its face

Exhibit 1 is not a complete copy of the Terms of Service agreements between Plaintiff and each law enforcement agency with which Plaintiff alleges it has an agreement.

19. Defendant is without sufficient information to respond to the allegations in paragraph 19.

20. Defendant is without sufficient information to respond to the allegations in paragraph 20.

21. The first sentence is a legal conclusion for which no response is required and deny the characterization as the agreements speak for themselves; Defendant also avers that the purported agreement attached to the Complaint as Exhibit 1 on its face is incomplete. Defendant is without sufficient information to respond to the allegations in the second sentence, which also contains legal conclusions for which not response is required and denies the characterization as the agreements speak for themselves; Defendant also avers that the purported agreement attached to the Complaint as Exhibit 1 on its face is incomplete. The third sentence is a legal conclusion for which no response is required and deny the characterization as the agreements speak for themselves; Defendant also avers that the purported agreement attached to the Complaint as Exhibit 1 on its face is incomplete. Deny the fourth sentence.

22. Admit the first, second, third, fourth and fifth sentences. Admit the sixth sentence with respect to the iPhone and on information and belief deny with respect to other mobile phones. Admit the seventh sentence.

23. Denied.

24. The first, second, third and fourth sentences are legal conclusions for which no response is required and deny the characterizations as the Terms of Use which speak for themselves. With respect to the fifth sentence, admit that a copy of the Terms of Use are attached as Exhibit 2 and

assert that the remained of the fifth sentence is legal conclusions for which no response is required and deny the characterizations of the Terms of Use which speak for themselves.

25. Admit the first sentence, except denies “purports.” Admit the second sentence. Admit the third sentence, except deny that particular crimes are displayed with a “pin” and assert that crimes are displayed with an icon. Admit the third sentence.

26. Deny the first sentence. Admit the second sentence, except deny that Defendant’s website is “generally geared toward providing media outlets, like television stations, with crime report information.” Deny the third sentence. Admit the fourth sentence and avers that it provides commentary and criticism on the data it displays on its blog.

27. Admitted.

28. Admitted.

29. Denied.

30. Admitted.

31. Admit the quoted language is an excerpt from the Terms of Use Admit, which speaks for itself.

32. Defendant is without sufficient information to respond to the allegations in paragraph 32.

33. Defendant is without sufficient information to respond to the allegations in paragraph 33.

34. Defendant is without sufficient information to respond to the allegations in paragraph 34.

35. Admit the first sentence. Defendant is without sufficient information to respond to the allegations in the remaining sentences of Paragraph 35.

36. With regard to the first sentence, admitted that a letter was sent to Defendant and deny the characterizations as the letter speaks for itself. With respect to the second sentence, admit that the letter is appended as Exhibit 3.

37. Admit the first sentence. With respect to the second sentence, admit that the letter is appended as Exhibit 4 and that what appears to be a transcription of the voice mail is appended as Exhibit 5.

38. Admitted.

39. Deny the first sentence. Admit the second sentence, except deny “demanding.”

40. Admitted that Defendant asked for crime data under applicable law and denies the remainder characterizing the data demanded.

41. With respect to the first sentence, admitted that Defendant asked for crime data under applicable law and deny the remainder. Deny the second and third sentences.

42. With respect to the first sentence admit that Defendant has increased its efforts to obtain crime data and deny the remainder. Defendant is without sufficient information to respond to the allegations in the second and third sentences.

43. With respect to the first sentence, admit that Greg Whisenant contacted Colin Drane and deny the remainder. With respect to the second sentence, admit that Greg Whisenant claimed that Defendant’ contacts with agencies was hurting Plaintiff’s business and that Plaintiff had lost a customer and deny the remainder. Deny the third and fourth sentences.

44. Deny the first and second sentences. With respect to the third sentence, admit that Public Engine’s lawyer sent a letter to Colin Drane to which Mr. Drane did not reply and deny the characterizations of the letter as the letter speaks for itself.

45. Defendant is without sufficient information to respond to the allegations, except that Defendant denies harassing any customer of Plaintiff.

46. With respect to the first sentence, Defendant is without sufficient information to respond to the allegations. Admit the second sentence. Deny the third sentence.

47. Denied.

48. With regard to the first sentence, admit that IP address 208.109.126.144 is an IP address of SpotCrime.com. With regard to the second sentence, Defendant is without sufficient information to respond to the allegations.

49. With regard to the first sentence, admit Defendant used a new IP address (174.129.243.60) and deny the remainder of the sentence. Deny the second sentence. With regard to the third sentence, Defendant is without sufficient information to respond to the allegations. Admit the fourth sentence.

50. Defendant is without sufficient information to respond to the allegations in Paragraph 50.

51. With regard to the first sentence, Defendant is without sufficient information to respond to the allegations. Admit second sentence. Deny the third and fourth sentences.

52. With regard to the first sentence, Defendant is without sufficient information to respond to the allegations. Deny the second sentence. With regard to the third sentence, Defendant is without sufficient information to respond to the allegations. Deny the fourth sentence.

53. Admitted.

53. Admitted.

54. Denied.

55. Denied.

56. Denied.

57. Deny the first sentence. With respect to the second sentence, admit that Defendant has recently announced a transaction with DirectTV, called “Crime Reports,” and denies the remaining allegations. Admit the third sentence up to and including the words “it represents has been developed by it” and deny the remaining allegations.

58. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

59. Paragraph 59 states a legal conclusion to which no response is required.

60. Paragraph 60 states a legal conclusion to which no response is required.

61. Paragraph 61 states legal conclusions to which no response is required.

62. Denied.

63. Paragraph 63 states a legal conclusion to which no response is required.

64. Denied.

65. Paragraph 61 states legal conclusions to which no response is required.

66. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

67. Paragraph 67 states legal conclusions to which no response is required.

68. Deny the first sentence. With respect to the second and third sentences, Defendant is without sufficient information to respond to the allegations. The fourth sentence is a legal conclusion for which no response is required. Admit the fifth sentence.

69. The paragraph is a legal conclusion to which no response is required.

70. Denied.

71. Paragraph 71 states legal conclusions to which no response is required.

72. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

73. Paragraph 73 states legal conclusions to which no response is required.

74. Paragraph 74 states legal conclusions to which no response is required.

75. Denied.

76. Denied.

77. Paragraph 77 states legal conclusions to which no response is required.

78. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

79. Admitted.

80. Denied.

81. Denied.

82. Denied

83. Denied.

84. Paragraph 84 states legal conclusions to which no response is required.

85. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

86. With respect to the first sentence, admit with respect to crime data from some law enforcement agencies and with respect to crime data from other law enforcement agencies Defendant is without sufficient information to respond to the allegation. With respect to the second and third sentences, Defendant is without sufficient information to respond to the allegations.

87. Denied.

88. Denied.

89. Admit that Defendant's website competes with Crimeports.com for providing crime reports to the public and in selling that information to news media outlets and deny that said information is "near real time."

90. Denied.

91. Denied.

92. Paragraph 92 states legal conclusions to which no response is required.

93. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

94. Paragraph 94 states legal conclusions to which no response is required.

95. Admit that Defendant is aware that Plaintiff purports to have contracts with certain law enforcement agencies and deny the remaining allegations.

96. Denied.

97. Denied.

98. Paragraph 98 states legal conclusions to which no response is required.

99. Defendant reincorporates by reference its responses to the preceding paragraphs of the Complaint as if fully set forth herein.

100. Denied.

DEFENSES

FIRST DEFENSE

101. Plaintiff is estopped from asserting its First, Second Third, Fifth and Seventh Claims for Relief.

SECOND DEFENSE

102. Each of Plaintiff's Claims for Relief is barred by the doctrine laches.

THIRD DEFENSE

103. Each of Plaintiff's Claims for Relief fails to state a claim for which relief can be granted.

FOURTH DEFENSE

104. Each of Plaintiff's Claims for Relief is barred by the doctrine of waiver.

FIFTH DEFENSE

105. Plaintiff's First, Second, Third and Fifth Claims for Relief are preempted by the federal Copyright Act, 17 U.S.C. § 101, *et seq.*

SIXTH DEFENSE

106. Plaintiff is barred from receiving equitable relief by the doctrine of unclean hands.

SEVENTH DEFENSE

107. Each of Plaintiff's Claims for Relief is barred by the First Amendment to the Constitution of the United States.

PRAYER FOR RELIEF

WHEREFORE, Defendant respectfully requests that this Court:

1. Deny the Plaintiff's prayer for relief in its entirety;
2. Dismiss the Complaint against Defendant;
3. Enter Judgment in favor of Defendant and against the Plaintiff.
4. Grant such other and further relief as this Court deems just and proper.

JURY DEMAND

Pursuant to Fed. R. Civ. P. 38, Defendant ReportSee, Inc. demands a jury on all issues triable to a jury.

Dated: May 14, 2010

Respectfully submitted,

PARR BROWN GEE & LOVELESS

/s/ Jeffrey J. Hunt

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ReportSee, Inc.

Dated this 14th day of May, 2010